

City of Springfield MS4 General Permit Stormwater Management Plan (MS4 Plan)



Public Education and Outreach



Public Participation



Illicit Discharge Detection



Construction Site Runoff



Post-Construction Stormwater Management



Pollution Prevention Municipal Operations

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MS4 GENERAL PERMIT STORMWATER MANAGEMENT PLAN (MS4 SWMP)

Overview

This document is Springfield's Stormwater Management Program document (SWMP) for the purpose of meeting the requirements of Oregon's National Pollution Discharge Elimination System (NPDES) Municipal Separate Sewer Storm System (MS4) stormwater permitting program, specifically the MS4 Modified General Permit effective March 1, 2019; modified March 12, 2021.

Springfield was issued its MS4 General Permit on June 1, 2021, expiring February 28, 2024. Under the MS4 Modified General Permit Springfield is required to update its stormwater management plan that addresses the federal NPDES Stormwater Phase II Program.

This MS4 General Permit Stormwater Management Program document (MS4 Plan) has been prepared with considerable expertise and experience in meeting the requirements of the NPDES Stormwater Phase II Program. It is written to address the Oregon Administrative Rules (340-041) and DEQ guidance documents to ensure that Springfield's stormwater management program and planned future activities are adequate to meet the minimum MS4 General Permit requirements.

MS4 STORMWATER PLAN - SUBMITTAL TO DEQ

Introduction/Background

The Federal Clean Water Act (CWA) was amended in 1987 to include regulations for non-point source discharges to U.S. waters under the National Pollutant Discharge Elimination System (NPDES) program. In 1990, the U.S. Environmental Protection Agency (EPA) issued regulations specific to stormwater discharges, which apply to entities that own and operate municipal separate storm sewer systems (MS4s). Under the NPDES program, these entities are required to obtain a MS4 NPDES permit for stormwater discharges. In Oregon, the EPA has delegated authority for the program to the Oregon Department of Environmental Quality (DEQ). The program has been implemented and administered in two phases. The "Phase I" regulations adopted in 1990 address stormwater discharges from MS4s serving populations of 100,000 or greater. The "Phase II" regulations, adopted in 1999, address discharges from small MS4s, serving populations between 50,000 and 100,000 people. Springfield falls under the Phase II category.

The Federal NPDES Phase II stormwater regulations set forth a process for cities and other entities to apply for MS4 permits. These regulations are described in the Code of Federal Regulations under 40 CFR, Part 122.26. As required by the MS4 permit process, Springfield compiled and developed information that described local receiving waters, the City's stormwater drainage system, and a summary of the City's stormwater management strategies for reducing pollutants discharged from the system.

Pursuant to 40 CFR §122.34(a), the permit registrant must at a minimum develop, implement, and enforce a stormwater management program designed to reduce pollutants from the MS4 to the maximum extent practicable, to protect water quality and to satisfy the appropriate water quality requirements of the Clean Water Act. Springfield's MS4 Plan identifies the management practices, control techniques and system, and design and engineering methods necessary to meet this standard. The MS4 permit application requires the development of a MS4 plan that addresses the following six control measures:

- | | |
|----------------------------|---|
| Control Measure #1: | Public Education and Outreach |
| Control Measure #2: | Public Involvement and Participation |
| Control Measure #3: | Illicit Discharge Detection and Elimination |
| Control Measure #4: | Construction Site Runoff Control |
| Control Measure #5: | Post-Construction Site Runoff for New Development and Redevelopment |
| Control Measure #6: | Pollution Prevention and Good Housekeeping for Municipal Operations |

For each Minimum Control Measure, the development and implementation of stormwater Best Management Practices (BMPs) are required. In addition, measurable goals for each of the BMPs must be established, responsible parties for implementing the BMPs must be identified, and a discussion of the rationale for how and why the specific BMPs are selected must be provided. In March 2003, the City submitted its first required permit application outlining stormwater management activities already completed by the City and those which still needed to be undertaken to comply with the NPDES requirements at that time.

On December 31, 2011 the City's Individual MS4 permit expired. In June 2011, the City submitted the required permit application documents for renewal outlining stormwater management activities already completed by the City and those which still need to be undertaken to comply with the NPDES requirements. Between 2012 and 2019 the DEQ worked with an advisory team and the EPA in the development of a General Permit in order to align permits and permit conditions across Oregon in one standard permit. In 2019, the DEQ switched to a General Permit format, but still has an Individual Permit option available in certain situations. On March 1, 2019 the General Permit for Phase II communities became effective, and on March 12, 2021 the permit was modified and reissued. Springfield was issued its permit on June 1, 2021.

This MS4 Plan completed by the City of Springfield's Environmental Services Division fulfills the DEQ's MS4 stormwater discharge permit application requirements to provide a MS4 SWMP program document by the second annual report. For Springfield the second annual report is due by November 1, 2022.

Description of the Permit Area

The City of Springfield was incorporated on February 25, 1885, and currently serves a population of 64,000 people (2021 census) within the city limits, and an additional 8,500 (approximately) within the urbanizable area. The geographic boundaries of the MS4 plan are the Springfield city limits and the urban growth boundary (UGB) (See Figure 1). The City's service area for stormwater planning encompasses approximately 15.9 square miles located within the city limits, and 8.2 square miles inside the urbanizable area (i.e., the area between the city limits and the UGB). The Springfield UGB encompasses the area in Lane County roughly bounded on the west by Interstate 5, eastward approximately seven miles, and between the McKenzie River on the north and the Willamette River on the south. Springfield's UGB also includes an area south of the Willamette River, referred to as Glenwood, and parts of this community are annexed into the city.

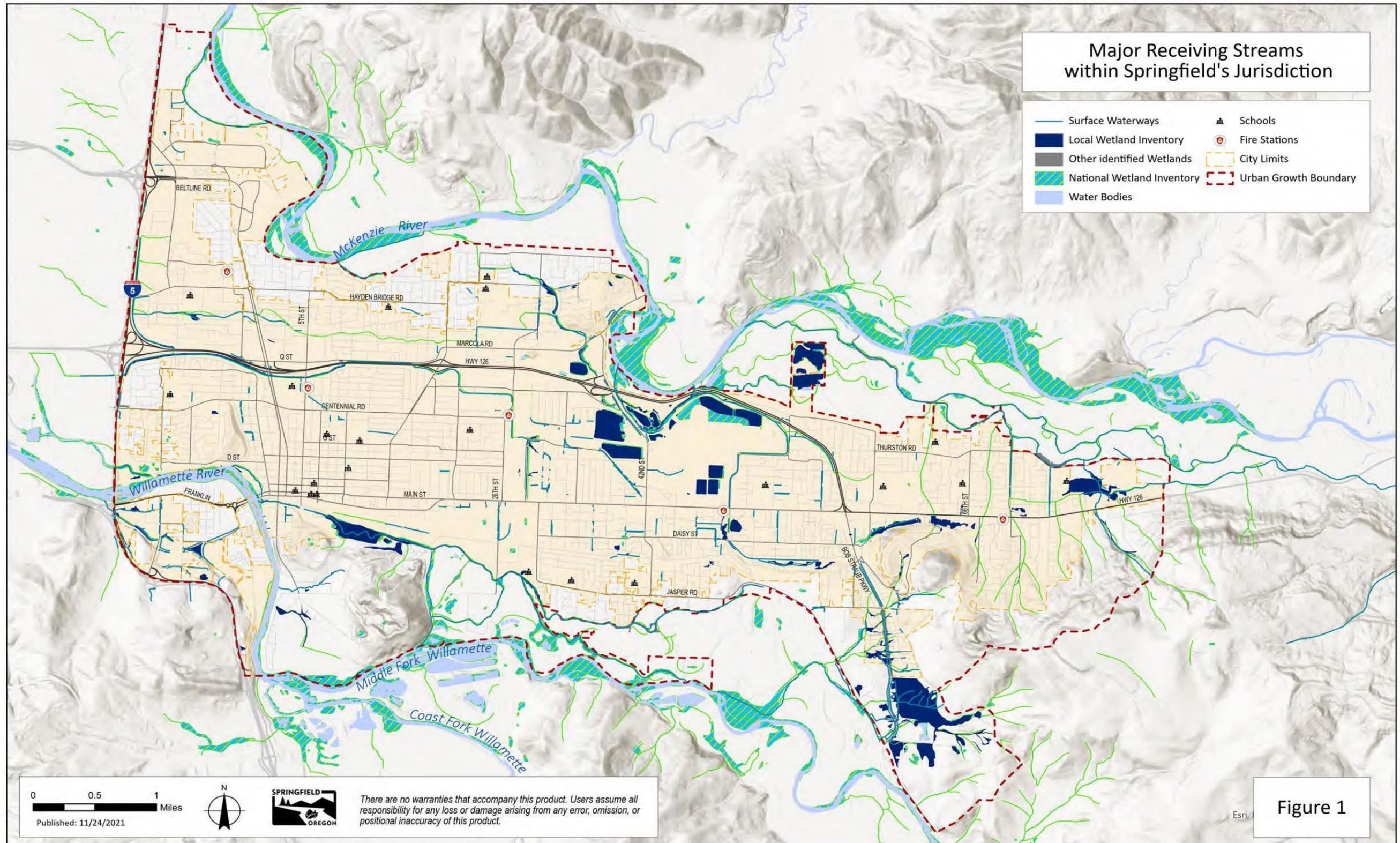
The City has authority and responsibility for planning, building, operating, maintaining, and regulating the stormwater drainage system within the city limits. Through an urban transition agreement with Lane County, the City also has long-range and current planning and building permitting responsibilities in the urbanizable area. The City does not have operation or maintenance responsibilities for the urbanizable area. Therefore, the MS4 permit for which this MS4 plan is submitted covers only the area within the Springfield city limits.

The major receiving streams within the City's jurisdiction include the McKenzie and Willamette Rivers (See Figure 1). Three other major waterways passing through the city limits and urbanizable area include the Springfield Mill Race, South Cedar Creek, and the Q Street Channel. Under Section 303(d) of the CWA, states are required to identify waters that fail to meet the water quality standards and are required to develop Total Maximum Daily Loads (TMDLs) to address the specific pollutants contributing to the water quality degradation. DEQ has listed reaches of the McKenzie and Willamette Rivers within or adjacent to Springfield as being "water quality limited."

The Willamette Basin TMDL was finalized in 2006 and daily loads were developed for temperature, bacteria, and mercury. All parties with discharges to the rivers, including the City of Springfield, have been allocated pollution limits for discharges to the affected waters. These limits are referred to as waste load allocations (WLA) and are set as a percent reduction value or the Designated Management Agency (DMA) is required to implement certain practices and provisions to minimize the pollutant (BMP-based requirements). While temperature is a known concern in Springfield's stormwater discharges, the contribution of mercury from Springfield's stormwater is not known. In 2008 the City of Springfield filed a Draft TMDL Implementation Plan (TMDL IP) with the DEQ as required; the DEQ approved the plan in April 2009. The current TMDL IP was updated and approved by the DEQ in July 2019.

On November 22, 2019, DEQ issued the Final Revised Willamette Basin Mercury Total Maximum Daily Load (Modified: 11/22/19). The EPA did not approve DEQ's TMDL on December 30, 2019 and issued their final TMDL on February 4, 2021. EPA's TMDL states that "reasonable assurance for their TMDL relies on DEQ's Water Quality Management Plan." The DEQ plan was issued on November 22, 2019 as part of the DEQ TMDL. The total mercury allocations specified in EPA's TMDL are effective for designated management agencies and responsible persons named in DEQ's management plan.

Springfield was notified by DEQ in March of 2021 that Springfield will be required to update its 2019 implementation matrix to incorporate the updated EPA mercury TMDL requirements. These requirements mean that Springfield must implement the six control measures of the MS4 General Phase II permit to remain in compliance.



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Springfield's MS4 Plan

City Stormwater Management Program - Responsible Parties:

The City is responsible for implementing surface water management activities within its boundaries, including the planning, design, construction, operation, and maintenance of the stormwater drainage system. In response to the NPDES Phase II stormwater requirements, the City has developed a MS4 plan addressing each of the six required Control Measures. The City's stormwater management program is the responsibility of the Development and Public Works Department (DPW). However, the implementation of the City's MS4 plan will extend throughout the City organization.

City Stormwater Management Program - Funding:

Operations within the City's stormwater management program, including development and implementation of the MS4 plan is completely funded by "drainage user fees," which are billed on a monthly basis. Drainage user fees are made up of a base fee plus a fee calculated on impervious area, including roofs and paved areas. Single family and duplex residences are charged a flat fee based on average amounts of impervious area. The stormwater drainage system Capital Improvements Program (CIP) is funded, in part, by user fees, and, in part by stormwater drainage system development charges (SDCs).

City of Springfield, Oregon		6/1/2022					
Storm Drainage Fund		FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
	Actual	Actual	Actual	Amended Budget	Proposed Budget	Forecasted Budget	Forecasted Budget
Personnel Services	\$ 2,913,235	\$ 3,268,552	\$ 3,396,185	\$ 3,946,300	\$ 4,011,800	\$ 4,200,000	\$ 4,400,000
Materials & Services	1,829,998	2,006,738	2,243,560	3,389,200	2,880,800	3,000,000	3,200,000
Total Storm Drainage Operations	\$ 4,743,233	\$ 5,275,290	\$ 5,639,745	\$ 7,335,500	\$ 6,892,600	\$ 7,200,000	\$ 7,600,000
Total Storm Drainage Capital	\$ 194,499	\$ 497,656	\$ 1,401,447	\$ 6,817,400	\$ 6,390,600	\$ 5,700,000	\$ 5,100,000

SWMP Requirements (MS4 Plan):

The MS4 Modified General Permit for a SWMP document require *"the permit registrant to maintain a written Stormwater Management Program Document (referred to as the SWMP Document), which describes in detail how the permit registrant complies with the required control measures in this permit. The SWMP Document must be reviewed and, if necessary, updated annually and must describe the permit registrant's schedule for implementation of any control measure components to be developed during the term of this permit"* (Schedule A.2.c).

Specific BMPs are proposed for each Control Measure, which are intended to support the reduction of discharges of pollutants in stormwater runoff to the maximum extent practicable (MEP). A summary sheet is provided for each Minimum Control Measure, which includes a list of the selected BMPs, the rationale for their development and selection, and a summary of the measurable goals and implementation schedule. The summary sheet is followed by a fact sheet for each of the selected BMPs. Together, the summary sheets and the BMP fact sheets provide the following information:

- (1) A list of the responsible parties for the BMP implementation
- (2) A brief description of the BMP
- (3) A description of existing conditions
- (4) The proposed MS4 plan activities
- (5) Measurable goals, and
- (6) An implementation schedule

The BMP development/implementation schedule shows when certain activities will be completed on a fiscal year basis. The MS4 Modified General Permit provides for a five-year implementation schedule. In March of 2004 the City submitted its original Individual MS4 permit application. In March 2007 the DEQ finalized the permitting process for phase II cities and implementation took place in July of 2007. The Individual MS4 permit for Springfield expired December 31, 2011. The MS4 General Permit was developed by DEQ and issued November 30, 2018 with an effective date of March 1, 2019. The General Permit was then modified and reissued as a Modified MS4 General Permit dated March 12, 2021. Springfield was issued the Modified MS4 General Permit June 1, 2021.

Minimum Control Measure #1: Public Education and Outreach on Stormwater Impacts

Regulation: Modified MS4 General Permit - Schedule A.3.a.

“The permit registrant must conduct an ongoing education and outreach program to inform the public about the impacts of stormwater discharges on waterbodies and the steps that they can take to reduce pollutants in stormwater runoff. The education and outreach program must be designed to address stormwater issues of significance within the permit registrant’s community.”

The Modified General Permit schedule further identifies targeted audiences and topics and requires that two (2) educational messages or activities be offered per year (MS4 permit year is a fiscal year not calendar year). Additionally, the permit registrant must at minimum, conduct education and outreach to each target audience identified at least once during the permit term; construction site operators must be targeted at least twice.

This section also requires program tracking, assessment, and reporting: *“The permit registrant must track implementation of the public education and outreach requirements. In each corresponding annual report, the permit registrant must assess their progress toward implementation of the program, including the evaluation of at least one education and outreach activity corresponding to the reporting timeframe for the associated annual report.”*

Applicable City of Springfield MS4 Plan BMPs

Public Education (PE):

PE1 - Public Education and Outreach Strategy (PEOS)

PE2 - Public Education and Outreach on Pollution Prevention and Stormwater Impacts

Rationale

Springfield selected the above two BMPs in order to cover a wide range of audiences including City Council, the general public, construction contractors, and staff. Springfield has been coordinating with other agencies (regional partners) like the City of Eugene, Lane County, ACWA, and others for many years, which helps to keep staff informed and educated on regional stormwater-related issues, such as existing materials and information available for common use and issues such as City stormwater management activities. Springfield’s strategy for developing and distributing the public education materials started in 2007 while under the NPDES Individual Permit with information such as the most typical

sources of pollutants in stormwater runoff and the impacts associated with those pollutants, and making this information available as educational handouts, flyers, on the City website, social media, and mailings.

Under PE1 – Public Education and Outreach Strategy we plan to continue working with and expand upon our robust regional partnerships as we have found them effective. Through the implementation of our 2010 SWMP, we found that a comprehensive PEO strategy was missing and would be helpful in directing and focusing our efforts more efficiently. Thus, we will be developing one for this MS4 Plan. The development of a Public Education and Outreach Strategy will streamline program and project information and documentation into a central document and will also include stewardship activities listed under PI2 – Public Involvement and Participation that are currently being implemented as these activities engage the participants in pollution prevention awareness. While under the Individual Permit, Springfield has been providing services to Lane County to implement educational and outreach efforts within the urban transition zone (UTZ). This agreement is planned to continue throughout the MS4 Modified General Permit term, as time and resources allow.

Springfield plans to continue to maintain an informed and educated City Council under PE1 through periodic communication of program requirements, regulations, strategies, and outcomes. The City Council and Planning Commission are important partners in the implementation of a successful stormwater management program. They establish citywide goals and policies, guide strategy development, and ultimately approve funding for stormwater management planning and capital project implementation.

Future activities planned under PE2 – Public Education and Outreach on Pollution Prevention and Stormwater Impacts will continue to include annual outreach efforts such as presentations, handouts, mailings, public events, advertisements, and workshops for the public and students, businesses, industry, and various other stakeholders, to educate them on City's stormwater management program, impacts of certain activities on stormwater, and what they can do to improve stormwater quality. Staff currently tracks and reports program implementation and educational and outreach efforts. Under PE2, tracking, program review, and assessment efforts will continue.

Responsible Parties

Under the direction of the Development and Public Works Department Division Director(s).

Summary of Measurable Goals

Staff will continue implementing outreach and educational programs while developing a Public Education and Outreach Strategy that will help guide ongoing program and project implementation. The strategy will also include stewardship activities currently being implemented and proposed.

Springfield will continue to maintain an informed and educated City Council under through periodic communication of program requirements, regulations, strategies, and outcomes. Springfield will continue to maintain an IGA with Lane County to implement education and outreach within the UTZ, within resources. Staff will continue to identify targeted audiences and educational opportunities, and use activities such as public events, printed and electronic material, consultation with city councilors, and social media to inform the public about the impacts of stormwater discharges on waterbodies and the steps that they can take to reduce pollution in stormwater runoff.

Staff will continue to track and report program implementation and educational and outreach efforts and provide a program review, and activity assessment in annual reports.

**Development/Implementation Schedule Summary
(permit year modified based on permit issuance date)**

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
PE1	Draft a Public Education and Outreach Strategy (PEOS).	Final PEOS.	Ongoing implementation of PEOS.	Ongoing implementation of PEOS; review/update as needed.
	Annually update City Council on stormwater outreach efforts and MS4 Plan activities.			
	No scheduled action.	Update renewal of IGA for NDPE Services with Lane County; provide update to Council.		Update renewal of IGA for NDPE Services with Lane County; provide update to Council.
PE2	Targeted PE implementation; distribute a minimum of 1 educational message to each audience.	Targeted PE implementation; distribute a minimum of 1 educational message to each audience.	Targeted PE implementation; distribute a minimum of 1 educational message to each audience.	Targeted PE implementation; distribute a minimum of 1 educational message to each audience.
	Continue existing PE programs; continue to implement existing program(s) with available resources. Adaptively manage, as needed.			
	Annual program review; develop program review and assess progress toward program implementation.		Assess progress toward program implementation.	Assess progress toward program implementation.

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	Develop an education and outreach activity assessment; conduct 1 assessment per year.	Assessment of 1 activity.	Assessment of 1 activity.	Assessment of 1 activity.
	Ongoing activity tracking, include a summary of PE program review and assessment of 1 education and outreach activity in the Annual Report.	Ongoing activity tracking, include a summary of PE program review and assessment of 1 education and outreach activity in the Annual Report.	Ongoing activity tracking, include a summary of PE program review and assessment of 1 education and outreach activity in the Annual Report.	Ongoing activity tracking, include a summary of PE program review and assessment of 1 education and outreach activity in the Annual Report.

BMP PE1: Public Education and Outreach Strategy (PEOS)**Responsible Parties**

Environmental Services Division, under the direction of the Development and Public Works Department Division Director.

BMP Description

This BMP provides for the development of a Public Education and Outreach Strategy (PEOS) that will help guide ongoing education and outreach program and project implementation. The strategy will also include stewardship activities currently being implemented and those being proposed. The education and outreach program will inform the public about the impacts of stormwater discharges on waterbodies and the steps that they can take to reduce pollutants in stormwater runoff. The strategy will include the targeted audiences and topics as listed in the MS4 Modified General Permit.

Continue to maintain an informed and educated City Council and Planning Commission through periodic communication of program requirements, regulations, strategies, and outcomes. Continue to work with Lane County to continue to implement the IGA between parties to provide education and outreach programs within the urban transition zone (UTZ). This agreement is binding within resources and an active IGA.

This BMP covers activities to meet Schedule A.3.a.a-ii of the Modified MS4 General Permit.

Existing Conditions

Springfield has been coordinating with other agencies like the City of Eugene, Lane County, ACWA, and others, which helps to keep staff informed and educated on regional stormwater-related issues. Springfield's strategy for developing and distributing public education materials started in 2007 while under the NPDES Individual Permit with information such as the most typical sources of pollutants in stormwater runoff and the impacts associated with those pollutants and making this information available within educational handouts and flyers at public events and through mailings. Springfield has been providing services to Lane County during this same time frame to implement educational and outreach efforts within the urban transition zone. Current and future activities will continue to include annual outreach efforts such as presentations, handouts, mailings, advertisements, and workshops for the public and students, businesses, industry, and various other stakeholders, to educate them on City's stormwater management program, impacts of certain activities on stormwater, and what they can do to improve stormwater quality. Springfield plans to continue working with regional partners and develop a strategy that will help guide ongoing program and project implementation. Springfield has tracked its programs and projects in documents referred to as "program or project descriptions." The drafting of a documented strategy will streamline these multiple

documents into one place and be used to help guide the education and outreach program and its future efforts.

The City Council and Planning Commission are important partners in the implementation of a successful stormwater management program. They establish citywide goals and policies, guide development, and ultimately approve funding for stormwater management planning and capital project implementation. A component of developing the Springfield MS4 plan has been a commitment to maintaining good communication with the City Council. Over the years, periodic communication of the goals and responsibilities of the stormwater program has resulted in seven long-term “Key Outcomes” developed as a framework for the stormwater management program. These outcomes were developed in 1999-2000 and reviewed annually since that time by the City Council.

The seven long-term Key Outcomes include:

1. Protect citizens and property from flooding,
2. Comply with Federal, State and local regulations and requirements,
3. Provide safe groundwater for drinking,
4. Ensure surface waters are safe for people and aquatic life,
5. Provide urban drainageways that are also community amenities,
6. Ensure that citizens, businesses, and industries understand the need to protect water quality and do their part, and
7. Provide regulatory certainty for the development community while ensuring growth is not constrained by lack of planning or facilities

Proposed MS4 Plan Activities

Staff will develop a Public Education and Outreach Strategy that will help guide ongoing program and project implementation. Environmental Services Division will work with Operations, Community Development, and Communications staff to develop a documented strategy. The drafting of a documented strategy will include existing programs and projects and planned outreach activities. The document will also include stewardship activities currently being implemented and proposed, and information on the IGA with Lane County for NPDES Services.

Staff will continue to update the City Council through informational communication packet items, briefing memos, and periodic work sessions. Communication efforts will be made at least one time annually to provide MS4 Plan and permit status, with additional updates and/or communication on new or specific programs, projects, and intergovernmental agreement renewal, as needed.

Staff will continue to work with Lane County on implementing and updating as needed the IGA for NPDES services within the UTZ.

Measurable Goals

Develop a Public Education and Outreach Strategy that will help guide ongoing program and project implementation by the end of the second fiscal year and begin implementing the strategy.

Continue to maintain an informed and educated City Council through periodic communication of program requirements, regulations, strategies, and outcomes throughout the permit term.

Continue to implement the IGA for NPDES services with Lane County to implement education and outreach within the UTZ, within resources, throughout the permit term. A review and redrafting, if appropriate, of the IGA will take place during the second fiscal year and at the end of the permit term.

Development/Implementation Schedule**BMP PE1:**

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
PE1	Draft a Public Education and Outreach Strategy (PEOS).	Final PEOS.	Ongoing implementation of PEOS.	Ongoing implementation of PEOS; review/update as needed.
	Annually update City Council on stormwater outreach efforts and MS4 Plan activities.			
	No scheduled action.	Update renewal of IGA for NDPE Services with Lane County; provide update to Council.		Update renewal of IGA for NDPE Services with Lane County; provide update to Council.

BMP PE2: Public Education and Outreach on Pollution Prevention and Stormwater**Responsible Parties**

Environmental Services, Operations, and Land Development Engineering Divisions under the direction of the Development and Public Works Department Division Director(s).

BMP Description

Springfield selected this BMPs to cover a wide range of audiences including the general public, homeowners, homeowner association, schoolchildren, and businesses (including home-based and mobile business), local elected officials, land use planners and engineers, and construction site operators.

Staff will use the target audience and topic lists from the MS4 Modified General Permit and continue to develop, review, and distribute educational messages to each audience. Staff will continue to track activities to ensure education and outreach to each target audience identified is completed at least once during the permit term. Construction site operators will be targeted at least twice. Staff will continue to implement existing program(s) within available resources, time, and adaptively manage.

Staff will develop a program review template and annually assess progress toward program implementation. Staff will also develop an Activity Assessment and conduct one (1) assessment per year. A summary of the PE Program Review and the Activity Assessment will be provided to the DEQ via the annual report each year.

This BMP covers activities to meet Schedule A.3.a.iii-vi of the Modified MS4 General Permit.

Existing Conditions

While under the Individual permit Springfield listed separate education and outreach BMPs and measurable goals. These included regional partner projects, pressure washing and car washing programs, auto shop programs, pet waste management, school education and outreach, clean water gardens, Stream Team activities, water quality facility maintenance, landscape service education, drain cleaner BMPs, restaurant and FOG BMPs, and mercury education, to name a few. The ongoing development of outreach materials, postings to social media, and website improvements to provide education and outreach via factsheets has greatly improved our outreach efforts.

Springfield continues to participate in regional events that reach large audiences such as Earth Day, Home and Garden Shows, BRING tour of homes, and Springfield's annual Spring Clean Up.

The City's Environmental Services staff coordinate with local and regional agencies and also develops programs in-house for public education efforts. The local/regional coordinating groups include: Pollution Prevention Coalition of Lane County (P2C) (a workgroup of staff from Springfield, Eugene, Lane County, Springfield Utility Board (SUB), Eugene Water and Electric Board (EWEB), Lane Regional Air Pollution Authority (LRAPA), and DEQ), Willamalane Park and Recreation District, Springfield School District 19, Clean Rivers Coalition, Urban Waters and Wildlife Partnership, Groundwater Guardians, and ACWA.

Various agencies and jurisdictions, both local and statewide, are involved with stormwater-related education efforts. Some of these entities have developed significant programs by virtue of involvement with NPDES regulations from the initial Phase I NPDES stormwater program in the early 1990s. Consequently, much information and program refinement has occurred, and several programs are quite advanced.

Information sharing is an efficient and effective way to gain expertise as well as multiply the efforts of any one group. The synergistic effect is increased further when working with local partners, as the "message" put forth by a combined effort is consistent across adjacent jurisdictions. Combining resources within the local area is a proven strategy to reduce confusion from inconsistent messages, gain support, enhance access to funding, and gain benefits from multiple viewpoints. Further, using an area-wide approach to identifying priorities for education ensures that jurisdictions are not working at cross-purposes.

Some examples are:

- P₂C provides useful, coordinated educational messages and technical assistance to the community regarding stormwater and pollution prevention issues. Examples of past efforts include a mercury thermometer exchange program at home show events, the development of a traveling educational display called the House of Pollution Solutions, DEQ grant-funded public information kiosks that are stationed throughout the metro area, and a Regional Eco-Biz Certification Program.
- Special Ops Team, a regional group focusing entirely on stormwater related outreach; participants include the City of Springfield, City of Eugene, and Lane County. This group has coordinated educational messages and technical assistance to the public involving car washing and pressure washing activities. Public messages have been advertised via radio, television, websites, and mailings. "Fish-friendly car wash kits" have been developed and are available to charity car wash groups. Pressure washing guidance documents were drafted for both professional mobile washers and the general public.
- The City is an active member of the Oregon Association of Clean Water Agencies (OR-ACWA). In terms of education, ACWA has compiled or published several stormwater-related guidance documents. They include Stormwater Best Management Practices Effectiveness Review. The group also developed a guide to managing underground injection facilities (UIC Manual), guidance documents on managing fats, oils, and greases in the wastewater system (FOG BMP Manual), an ESA guidance manual for cities, and a model erosion control program.

- Springfield along with the Willamalane Parks and Recreation District and School District 19, works on the installation and maintenance of doggie pot stations throughout Springfield's parks, schools and public greenways.
- Staff has developed and participated in various outreach and educational projects with a wide range of students from elementary to high school classes. Exercises include an overview of the stormwater drainage system in relation to other systems (wastewater, drinking water). Science activities such as macroinvertebrate collection and identification, and water sampling are also done at a basic level with students. The main program currently being taught is Clean Water University.
- Other activities done regularly with students are outreach events associated with annual events such as Earth Day, Public Works Week, Day of Caring, and Willamalane Children's Celebration.
- As part of an intergovernmental agreement, SUB includes inserts into its monthly utility billing statements on a twice-yearly basis. One of these inserts is dedicated to billing and user fee information. In the other insert focuses stormwater pollution prevention. The brochure varies each year but is dedicated to issues that impact the storm and sanitary sewer systems. Frequent topics include proper handling of pet wastes, hazardous materials, lawn care and gardening, household chemicals and procedures for reporting pollution problems. Billing statements are sent monthly to approximately 32,000 businesses and households plus 2,000 digital, resulting in an opportunity to reach a wide audience.
- Past surveys have shown that public knowledge of the stormwater drainage system is low, and that many people believe that storm drains are connected to sanitary sewers or that the water is otherwise treated to eliminate pollutants. Marking a simple message either on or adjacent to catch basins or other storm drain catchment structures is an effective way to educate the public. Springfield marks storm drains with "dump no waste, drains to stream" stainless steel buttons. Our UpStream Art projects educate the community about the connection between storm drains and waterways and invites local artists to paint murals at storm drains in places where people tend to gather (such as downtown, trailheads, schools, etc.).

Proposed MS4 Plan Activities

The City will continue to participate in local/regional/state partnerships that are deemed valuable in terms of public outreach effectiveness. If the opportunity presents itself, new partnership programs will be considered to determine if they are appropriate for the City to join. The City will continue provide factsheets and informational brochures at events, on the City website, and at local businesses.

Target topics and pollutants are based on TMDLs for our area and Springfield's IDDE program. TMDL pollutants such as mercury, temperature, bacteria, and IDDE pollutants such as sediment, soap, hydrocarbons and pollutants associated with automotive fluids, pesticides, fertilizers, e-waste, paint and solvents will continue to be the focus of the outreach efforts.

The Modified General Permit lists targeted audiences and topics within the permit. Staff will track to ensure education and outreach is done to each target audience identified at least once during the permit term and construction site operators twice. Staff will develop a program review template and assess progress toward program implementation, develop an activity assessment and assess one activity conducted per year; both will be included in the annual report.

Measurable Goals

Continue to implement existing program(s) with available resources and adaptively manage as needed, throughout the permit term. Annually select from the general permit target audience list and subject areas and distribute a minimum of one educational message to each audience. (Resulting in 3 interactions per reporting period.) Track to ensure education and outreach is done to each target audience identified at least once during the permit term, construction site operators will be targeted at least twice. Develop a program review and assess progress toward program implementation, develop an activity assessment and assess one activity conducted per year; include both as part of the annual reporting process.

Development/Implementation Schedule

BMP PE2:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
PE2	Targeted PE implementation; distribute a minimum of 1 educational message to each audience.	Targeted PE implementation; distribute a minimum of 1 educational message to each audience.	Targeted PE implementation; distribute a minimum of 1 educational message to each audience.	Targeted PE implementation; distribute a minimum of 1 educational message to each audience.
	Continue existing PE programs; continue to implement existing program(s) with available resources. Adaptively manage, as needed.			
	Annual program review; develop program review and assess progress toward program implementation.		Assess progress toward program implementation.	Assess progress toward program implementation.

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	Develop an education and outreach activity assessment; conduct 1 assessment per year.	Assessment of 1 activity.	Assessment of 1 activity.	Assessment of 1 activity.
	Ongoing activity tracking, include a summary of PE program review and assessment of 1 education and outreach activity in the Annual Report.	Ongoing activity tracking, include a summary of PE program review and assessment of 1 education and outreach activity in the Annual Report.	Ongoing activity tracking, include a summary of PE program review and assessment of 1 education and outreach activity in the Annual Report.	Ongoing activity tracking, include a summary of PE program review and assessment of 1 education and outreach activity in the Annual Report.

Minimum Control Measure #2: Public Involvement/Participation

Regulation: Modified MS4 General Permit - Schedule A.3.b.

“The permit registrant must implement a public involvement and participation program that provides opportunities for the public to effectively participate in the development of the SWMP control measures. The permit registrant must comply with their public notice requirements when implementing a public involvement and participation process.”

The Modified General Permit Schedule further identifies that *“the permit registrant must maintain and promote at least one publicly accessible website with information on the permit registrant’s SWMP implementation, the SWMP Document, contact information, and educational materials. The website must be maintained with current information and be updated at least annually. The permit registrant’s website must incorporate the following:*

- (A) Illicit Discharge Complaint or Report requirements (see Schedule A.3.c.v).*
- (B) Draft documents issued for public comment, final reports, plans and other official SWMP policy documents.*
- (C) Links to all ordinances, policies and/or guidance documents related to the construction and post-construction stormwater management control programs, including education, training, licensing, and permitting.*
- (D) The permit registrant’s contact information for relevant staff, including phone numbers, mailing addresses and email addresses.”*

Additionally, *“the permit registrant must, at a minimum, create or partner in the development of one stewardship opportunity during the permit term. The permit registrant may consider one of the following stewardship opportunities or a more locally relevant opportunity”:*

- (A) Stream team activities,*
- (B) Storm drain marking or stenciling,*
- (C) Volunteer monitoring,*
- (D) Riparian plantings/facility enhancement,*
- (E) Neighborhood low-impact development activities,*
- (F) Adopt-A-Road,*
- (G) Citizen advisory committee, or*
- (H) Other locally relevant opportunities.*

This section also requires program tracking, assessment, and reporting: *“The permit registrant must track implementation of the public involvement and participation requirements. In each corresponding annual report, the permit registrant must assess their progress towards implementation of the program.”*

Applicable City of Springfield MS4 Plan BMPs

Public Involvement (PI):

PI1 -- Public Involvement/Participation Access

PI2 -- Public Involvement/Participation Stewardship/Reporting

Rationale

Springfield selected the above two BMPs to address Public Involvement/Participation and to complement its public education efforts. The City has a Committee for Citizen Involvement (CCI), created by Ordinance, which provided initial review and approval of the public involvement plan included in the Individual MS4 permit application. That plan outlined opportunities for public input into the Stormwater Plan via three open-house events, held at various stages of the Stormwater Plan development. These events included informational posters and graphic displays, with staff available to answer questions and solicit feedback. A substantial outreach effort was implemented during Springfield’s first permit cycle, including mass mailings, telephone calls, newspaper advertising, internet notification, and direct contact with stakeholders, to ensure that they were aware of the public events and the opportunity to contribute feedback. Outreach was directed at the general public as well as applicable professional and environmental organizations and the development community. A similar outreach effort/approach will be used in updating the SWMP and development of this MS4 Plan.

Under PI1 - Public Involvement/Participation Assess, the City will provide continued implementation of public involvement and participation process by complying with state and local public notice requirements. Additionally, PI1 will enhance website posting and maintenance, providing the public with easy access to information and opportunities to provide feedback. This will allow Springfield to gain additional feedback in program implementation and opportunity options.

Under PI2 – Public Involvement/Participation Stewardship/Reporting, the City will continue working with local agencies on providing stewardship and educational opportunities such as developing a public awareness and involvement program addressing the Springfield Mill Race, and other natural or constructed water resource areas that provide water quality benefits in the city. Water resource areas consist of both natural and constructed open stormwater conveyance and/or treatment systems such as ponds, swales, channels and streams. The programs are directed at raising awareness of the Mill Race and local waterways and their associated habitat issues and seeking out and organizing citizens to

become involved with various anticipated ongoing vegetation, habitat, and water quality restoration maintenance efforts. Components of the programs may include developing descriptive graphics and signage for special areas of the Mill Race and other publicly accessible water resource areas, such as open drainageways and constructed wetland/stormwater ponds. Springfield will continue to work towards organizing citizen participation in enhancement efforts, periodic cleanup efforts, providing technical assistance or assisting with educational or interpretive events. The City also partners with other regional groups, HOAs, and businesses to enhance local waterways, stormwater facilities, and voluntary installation of onsite stormwater treatment enhancements/retrofits.

PI2 will also ensure continued tracking of program implementation and reporting.

Responsible Parties

Under the direction of the Development and Public Works Department Division Director(s).

Summary of Measurable Goals

The City will provide opportunities for public input on the stormwater management plan in various forms, such as surveys, website postings, and/or public events. Additionally, the City Council will be periodically updated on the stormwater management program and efforts to meet MS4 Permit Program implementation. Staff will continue implementation of public involvement and participation process by complying with state and local public notice requirements. Staff will continue to enhance website posting and maintenance providing the public with easy access to information and opportunities to provide feedback. Continue to offer stewardship opportunities and continue program tracking and reporting. Develop a program review and assess progress toward program implementation and include as part of the annual reporting process.

Development/Implementation Schedule Summary (permit year modified based on permit issuance date)

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
PI1	Continued implementation of public involvement and participation process by complying with state and local public notice requirements. Continue to provide opportunities for public input on the stormwater programs in various forms.			

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	Review required permit components for website posting to ensure all are being met.		Ongoing posting and maintenance of required components.	
PI2	Continue to implement existing stewardship opportunity projects to groups that wish to work on water quality and riparian enhancement projects, within resources. Implement at least one stewardship opportunity during the 5 yr term – aim to hold at least 1 event per year.			
	Ongoing activity tracking, develop a program review and assess progress toward program implementation; include a summary of PI program review in the Annual Report.	Ongoing activity tracking, include a summary of PI program review in the Annual Report.	Ongoing activity tracking, include a summary of PI program review in the Annual Report.	Ongoing activity tracking, include a summary of PI program review in the Annual Report.

BMP PI1: Public Involvement/Participation Access**Responsible Parties**

Environmental Services and Operations Divisions, under the direction of the Development and Public Works Department Division Director(s).

BMP Description

Under this BMP, the City will provide opportunities for public input, easy access to information, and opportunities to provide feedback on the stormwater management programs in various forms, such as surveys, website postings, and/or public events. Additionally, the City Council will be periodically updated on the stormwater management program and efforts to meet program implementation. The City will provide continued implementation of public involvement and participation process by complying with state and local public notice requirements.

This BMP covers activities to meet Schedule A.3.b.b-ii of the Modified MS4 General Permit.

Existing Conditions

Public involvement and review are a component of significant regulatory actions at the City, and is, therefore, an ongoing effort. The Planning Commission (PC), in its role as the Committee for Citizen Involvement (CCI), provided initial review and approved the Public Involvement work plan and schedule for the current 2010 Stormwater Management Plan.

In development of the City's Stormwater Management Plan, outreach to citizen, civic and neighborhood groups regarding the public events were conducted through a broad effort. Public comments and questions were solicited at workshops. Formal public hearings also were convened by the Planning Commission in recommending, and the CCI in adopting, the Stormwater Management Plan. Outreach efforts will be made for this renewal application by posting this MS4 Plan and associated documents on the City's web page where the public can provide additional comment and feedback and City Council, and the Commission will continue to be updated and well informed. A similar outreach effort and approach will be used in updating the SWMP, as needed.

The City maintains a website that provides easy access to stormwater and water quality programs and projects. The site provides the public with ability to report illicit discharges, and dumping, access to clean water factsheets, water quality facility maintenance information, contractor educational material on construction permitting and erosion control, provides stormwater planning documents and annual reports, access to City codes and planning activities. Website posting also includes newsletters and event information, which both convey stormwater information, articles, project updates, and activities.

Enhancements to website posting and maintenance will provide the public with easy access to information and opportunities to provide feedback. This will allow Springfield to gain additional feedback in program implementation and options.

Proposed MS4 Plan Activities

The City will continue implementation of public involvement and participation process by complying with state and local public notice requirements. Continue to provide opportunities for public input on the stormwater programs in various forms, such as surveys, website postings, and/or public events. Additionally, the City Council will be periodically updated on the stormwater management program and efforts to meet program implementation.

Continue to review and as needed make enhancements to website postings and stormwater information and provide the public with easy access to information and opportunities to provide feedback. Staff will review the required website components listed in the modified general permit and ensure all required components are being met and maintained.

Measurable Goals

Continue to implement a public participation process throughout the permit term. Review the required website posting components by the end of the second fiscal year and update as needed, to ensure all are being met. Provide opportunities for public input on the stormwater programs in various forms, such as surveys, website postings, and/or public events throughout the permit term.

Development/Implementation Schedule

BMP PI1:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
PI1	Continued implementation of public involvement and participation process by complying with state and local public notice requirements. Continue to provide opportunities for public input on the stormwater programs in various forms.			
	Review required permit components for website posting to ensure all are being met.		Ongoing posting and maintenance of required components.	

BMP PI2 - Public Involvement/Participation Stewardship/Reporting**Responsible Parties**

Environmental Services and Operations Divisions, under the direction of the Development and Public Works Department Division Director(s).

BMP Description

Under this BMP, staff will continue working with local agencies on providing stewardship and educational opportunities. Programs will be directed at raising awareness of the Mill Race and other local waterways, water quality facilities, and their associated habitat. Staff will continue to seek out and organize community members to become involved with various anticipated ongoing vegetation, habitat, and water quality restoration maintenance efforts.

Other tasks include partnering with other regional groups, HOAs, and businesses to enhance local waterways, stormwater facilities, and voluntary installation of onsite stormwater treatment enhancements/retrofits. Goals for the facility enhancement projects will continue to include researching project opportunities, program enhancement, and implementation.

Staff will continue program tracking and reporting, develop a PI Program review template and assess progress toward program implementation and included as part of the annual reporting process.

This BMP covers activities to meet Schedule A.3.b.iii-iv of the Modified MS4 General Permit.

Existing Conditions

Springfield is engaged in a long-term ecosystem restoration of its historical Mill Race and Mill Pond to improve habitat and water quality for endangered salmonids. This multi-year effort has resulted in an amenity that will present multiple opportunities for public involvement, from actual hands-on stream restoration work to ongoing maintenance and informational/ educational events. Enhancement opportunities continue to be researched and developed to address ongoing vegetation management, interpretive sign development and installation, and maintenance.

Similarly, various water resource areas exist throughout the city, these areas include sloughs, natural and constructed ponds and channels, and wetlands/riparian areas. These areas will benefit from increased public awareness and are a good fit for incorporating community participation in both awareness and “hands-on” assistance. The purposes of

this effort are to educate, foster stewardship recruitment efforts, and provide increased awareness, which will, in turn, lead to improved habitat and water quality.

Springfield currently is partnering with regional groups, HOAs, and businesses to enhance local waterways, stormwater facilities, and voluntary installation of onsite stormwater treatment enhancements/retrofits.

Proposed MS4 Plan Activities

Staff will continue working with local agencies on providing stewardship and educational opportunities. Projects will be directed at raising awareness along local waterways and their associated habitat issues and seeking out and organizing community members to become involved with various anticipated ongoing vegetation, habitat, and water quality restoration maintenance efforts. Other tasks include partnering with other regional groups, HOAs, and businesses to enhance local waterways, stormwater facilities, and voluntary installation of onsite stormwater treatment enhancements/retrofits. Goals for the facility enhancement projects will continue to include researching project opportunities, program enhancement and implementation.

Staff will continue program tracking and reporting, develop a PI Program review template and assess progress toward program implementation and included as part of the annual reporting process.

Measurable Goals

Continue facility enhancement projects and researching project opportunities. Continue to make program enhancements and implement at least one stewardship opportunity during the 5-year term – aim to hold at least 1 event per year. Develop a PI Program review template by the end of the second fiscal year and assess progress toward program implementation and included as part of the annual reporting process.

Responsible Parties

Environmental Services and Operations Divisions

Development/Implementation Schedule

BMP PI2:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
PI2	Continue to implement existing stewardship opportunity projects to groups that wish to work on water quality and riparian enhancement projects, within resources. Implement at least one stewardship opportunity during the 5 yr term – aim to hold at least 1 event per year.			
	Ongoing activity tracking, develop a program review and assess progress toward program implementation; include a summary of PI program review in the Annual Report.	Ongoing activity tracking, include a summary of PI program review in the Annual Report.	Ongoing activity tracking, include a summary of PI program review in the Annual Report.	Ongoing activity tracking, include a summary of PI program review in the Annual Report.

Minimum Control Measure #3: Illicit Discharges Detection and Elimination

Regulation: Modified MS4 General Permit - Schedule A.3.c.

“The permit registrant must implement and enforce a program to detect and eliminate illicit discharges into the MS4, to the extent allowable by state laws. An illicit discharge is any discharge to an MS4 that is not composed entirely of stormwater.”

This Modified General Permit Schedule further identifies:

- MS4 mapping requirements
- Ordinance and/or other regulatory mechanisms to prohibit non-stormwater discharges
- Enforcement procedures to address repeat violations and achieve compliance
- Program to detect and eliminate illicit discharges
- Notification to other authorities if discharges originate outside registrant’s jurisdiction
- Complaint tracking of illicit discharge reports
- Dry weather screening program
- Training and education of responsible key staff

This section also requires program tracking, assessment, and reporting: *“The permit registrant must track implementation of the IDDE program requirements. In each corresponding annual report, the permit registrant must assess their progress towards implementation of the program.”*

Applicable City of Springfield MS4 Plan BMPs

Illicit Discharge (ID):

ID1 -- Illicit Discharge Ordinance, Response, Enforcement, and Tracking

ID2 – MS4 Map

ID3 -- Dry Weather Screening Program

ID4 -- Non-Stormwater Discharge Assessment

Rationale

Springfield selected the above four BMPs to address illicit discharge requirements listed in the MS4 General Permit; our IDDE Program is well established and implemented. BMP ID1 - Illicit Discharge Ordinance, Response, Enforcement, and Tracking has three activities that cover the City’s processes that responds to and documents complaints regarding water quality including illicit discharges and dumping, continued implementation of illicit discharge regulatory authority, continued implementation of IDDE enforcement, program review, and

tracking and reporting. The City's program to prohibit illicit discharges and its enforcement response which address the requirements to have an ordinance and/or other regulatory mechanisms to prohibit non-stormwater discharges, enforcement procedures to address repeat violations and achieve compliance, notification to other authorities if discharges originate outside our jurisdiction, and a process for complaint reporting and tracking has been in place since its implementation of the Individual NPDES permit. Our program is well established and staffed therefore under this BMP we plan to continue to implement our illicit discharge program while we review the program to ensure compliance with the Modified General Permit requirements and make program improvements if needed.

BMP ID2 – MS4 Map, addresses MS4 infrastructure mapping requirements to have in place a stormwater infrastructure map that identifies piped and open MS4 systems and stormwater controls such as water quality facilities. The City has had in place since its implementation of the Individual NPDES permit a GIS mapping system for the public infrastructure. In 2010 the City began incorporating mapping of both public and private post-construction stormwater controls both vegetated and structural. These mapping layers are maintained on an ongoing basis as City infrastructure expands and as private water quality post-construction facilities are constructed. Updates to improve major basin area, sub-basin area, outfall and system jurisdictional ownership, and facility location are currently being evaluated with planned updates to improve mapping accuracy. Additionally, under this BMP the dry-weather mapping requirement to identify priority point locations will be incorporated into a mapping layer.

BMP ID3 - Dry Weather Screening Program address the requirement to have a dry-weather screening program in place to aid in the identification and elimination of illicit discharges. Dry-weather screening program is a snapshot of what is occurring at the time of the visual inspection and does not necessarily determine the overall health or water quality for a given system. Springfield has completed past waterway and outfall assessments within its UGB. These past assessments have help document channel location, flow direction and connectivity, outfall location and impacts to a channel, and has even identified a few illicit discharges that have since been eliminated. From these assessments and inventories Springfield updated its infrastructure mapping, eliminated identified illicit discharges, identified areas that could benefit from enhancements such as tree planting to improve temperature, and stewardship opportunity locations. This BMP will focus on the development of a dry-weather screening program that includes the development of a pollutant parameter action level list, identifying field screening location, and annual field screening of the priority locations. ID3 also includes a IDDE training, which is part of a larger internal staff training strategy, to ensure at least once during the permit term persons involved in IDDE implementation are trained.

BMP ID4 – Non-Stormwater Discharge Assessment address the assessment of non-stormwater discharges. Under the Individual Permit Springfield conducted an assessment of the discharges listed in the permit as being allowable stormwater discharges. This assessment made a determination about these discharges and determined whether they adversely impact our MS4 stormwater system and local waterways. The assessment was compiled into a report in 2009 and updated in 2010, which provided staff with guidance and applicable local regulations by discharge category. Under this BMP there will be a review

and update to the assessment. This BMP also includes a review and updates, if needed, to a product review assessment that staff drafted. The product assessment is similar to the non-stormwater discharge assessment and looked into the use of certain outdoor products and applications such as snow/ice control, moss control, and dust control and assessed the impacts pertaining to water quality and provides user guidance.

Responsible Parties

Environmental Services and Operations Divisions, under the direction of the Development and Public Works Department Division Director(s). Information Technology Division and the City Attorney's Office.

Summary of Measurable Goals

The measurable goals of the illicit discharges program will continue to include:

- Continued implementation of the existing IDDE response and enforcement program and implement a program review process to ensure compliance.
- Annual IDDE Program review and continued tracking and reporting of the number of illicit discharges that are encountered and enforcement response conducted.
- Maintaining, reviewing, and updating as needed, MS4 infrastructure mapping to ensure they are up-to-date and submittal of Springfield's MS4 Map.
- Continued implementation and enforcement of an ordinance to prohibit illicit discharges.
- Continued implementation of current IDDE enforcement procedures and enforcement matrix, including review and submittal of enforcement matrix.
- Development of a dry-weather screening program and identifying outfalls, priority locations, and a pollutant parameter action level list.
- Conduct field screening of 40% of MS4 outfalls by end of the permit term.
- Development of a training strategy to ensure annual training of IDDE staff and provide awareness training to other key city staff members as needed.

Development/Implementation Schedule Summary (permit year modified based on permit issuance date)

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
ID1	Continue to implement existing IDDE response and enforcement program and conduct a program review to		Finalize response and enforcement	Continue response and enforcement

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	ensure compliance; identify program gaps and needs.		program review and update.	program implementation.
	Develop an annual IDDE program review template to ensure permit requirements are being met; submit review summary in annual report(s).		Submit review summary in annual report.	Submit review summary in annual report.
	Annually summarize in the Annual Report the IDDE tracking information.			
ID1	Continue to implement and enforce ordinance and/or other regulatory mechanisms to prohibit illicit discharges.			
	Review existing IDDE ordinance and verify compliance with authority to investigate, require the elimination of illicit discharges, and define the range of illicit discharges it covers.	Finalize review of existing IDDE ordinances.	Code update and Council adoption if necessary - Modified Permit extended to Feb 28, 2024.	
	Continue to implement current IDDE enforcement procedures and matrix.			
	Review and update enforcement procedures and matrix as necessary.	Finalize enforcement procedures and matrix updates and take to Council if needed.	By Nov. 1, 2023, submit enforcement procedures in 3 rd Annual Report. (Modified Permit extended to Feb 28, 2024).	
ID2	Ongoing City GIS mapping and inventory of storm system infrastructure(s).			
	Review mapping and inventory requirements and identify gaps and needs; update as needed.		Finalize review; include mapping standards in SWMP by Nov 1, 2022	No action unless mapping updates not completed – Modified Permit extended map submittal to Feb 28, 2024

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	Perform any in-field or desktop data gathering as needed. (UGB expansion area) Finish re-defining storm system basins.		Finalize any in-field or desktop data gathering as needed.	No later than Nov 1, 2023 – submit MS4 map with the 3rd annual report. Modified Permit extended submittal to Feb 28, 2024, if needed.
ID3	Develop a dry-weather screening program; identify outfalls and priority locations.		Finalize and implement a field screening program.	Implement a field screening program. (Modified permit extended to Feb 28, 2024)
	No action.		Conduct field screening of 40% of MS4 outfalls. (Modified permit ext. to Feb 28, 2024)	
	Develop Pollutant Parameter Action Level list.	Finalize Pollutant Parameter Action Level list.	By Nov 1, 2022 submit Pollutant Parameter Action Level list.	No action
	Incorporate IDDE training into the internal staff training strategy	Finalize training strategy. Modified Permit extended to Feb 28, 2024 if needed.	Train IDDE and screening field staff at least once during the permit term.	
ID4	Review Non-Stormwater Discharge Assessment document, update as needed.		Continue to implement actions according to the Non-Stormwater Discharge Assessment.	
	Review Product Assessment Document, update as needed.		Continue to implement actions according to the Product Assessment.	

BMP ID1: Illicit Discharge Ordinance, Response, Enforcement, and Tracking**Responsible Parties**

Environmental Services and Operations Divisions, under the direction of the Development and Public Works Department Division Director(s). Information Technology Division and the City Attorney's Office.

BMP Description

This BMP address the City's processes that respond to and document complaints regarding water quality including illicit discharges and dumping, continue implementation of illicit discharge regulatory authority, continued implementation of IDDE enforcement, program review, and tracking and reporting.

This BMP covers activities to meet Schedule A.3.c.iii-v and viii of the Modified MS4 General Permit.

Existing Conditions

The City's program to prohibit illicit discharges and its enforcement response which address the requirements to have an ordinance and/or other regulatory mechanisms to prohibit non-stormwater discharges, enforcement procedures to address repeat violations and achieve compliance, notification to other authorities if discharges originate outside our jurisdiction, and a process for complaint reporting and tracking has been in place since its implementation of the Individual NPDES permit. Springfield's program is well established and staffed. Under this BMP we plan to continue to implement our enforcement and response activities for the illicit discharge program while we review the program to ensure compliance with the Modified General Permit requirements and make program improvements as needed.

The City has developed increased ability to respond to stormwater polluting incidents with trained staff, necessary equipment, and enforcement authority. An important aspect of the City's overall program has been to coordinate and augment the City's report response among the Development and Public Works, Police, and Fire and Life Safety Departments. In developing the current program, Environmental Services staff assessed the response process that was being used by the City's various departments for spills, dumping, and other environmental incidents. As a result, standard operating procedures and guidelines have been developed to clarify response protocols and establish consistent communication and enforcement procedures. The Environmental Services and Operations Divisions both maintain and share databases that track incidents and follow-up actions taken to resolve them. The City's Code Enforcement Division and the City Attorney's Office both provide assistance in enforcement of legal actions and the citation process.

Staff has varying degrees of training and knowledge of the enforcement authority available to them to resolve illegal activities that threaten the stormwater drainage system and receiving waterways. Staff and legal counsel have reviewed Federal, State, and local laws and Codes directly enforceable by City staff and legal counsel regarding illegal erosion, land alteration activities, dumping, illicit discharges, and other water polluting events. As a result, amendments to the Municipal Code provide broad ability for the City to assess and determine when actions negatively impacting any elements of the stormwater drainage system are unlawful and require abatement. The Code also provides authority for the City to take measures appropriate and necessary to abate the situation. Sections of the Municipal Code, and various sections of the Springfield Development Code, supplement the nuisance and IDDE prohibitions of the Code by enabling the City to protect the stormwater drainage system and enforce against those who cause damage to it.

Staff additionally developed reporting and educational platforms such as website reporting, email reporting, and reporting phone numbers on signs as well as on educational material. This has increased public awareness and the ability for the public to actively report pollution.

The City and Lane County have also agreed upon an IGA for NPDES service for responding to and enforcing illicit discharge and dumping in the area between the City Limits and the UGB. The City has also updated and adopted code that is uniform with Lane County for illicit discharges.

Proposed MS4 Plan Activities

Regarding incident response, City staff will continue to respond, enforce and track illicit discharges and complaints while a review of the response and enforcement program is conducted. The response and enforcement program, protocols, and guideline review will consist of reviewing and comparing current practices and procedures with the MS4 Modified General Permit requirements and maintaining current contact information. Additionally, an annual IDDE program review will be done to ensure permit requirements for response and enforcement are being met along with the submittal of a summary in annual reports and summarized IDDE tracking information.

Regarding regulatory mechanisms to prohibit illicit discharges, the City will continue to implement and enforce an ordinance and/or other regulatory mechanisms to prohibit illicit discharges to the MS4 while a review is conducted to ensure compliance with the conditions of the MS4 Modified General Permit requirements. The review will consist of examining existing IDDE ordinance and verify compliance with authority to investigate, require the elimination of, and define the range of illicit discharges it covers.

Staff will continue to implement the current IDDE enforcement procedures and enforcement matrix while a review of the enforcement matrix is conducted, update if needed, and submit to the DEQ.

Measurable Goals

Continue to respond, enforce, and track illicit discharges and complaints throughout the permit term. Perform a review of the response and enforcement program at least once during the permit term and review the response protocols, enforcement matrix, guidelines, SOPP's and update as needed. Develop an annual IDDE program review template to assess program implementation and provide a review summary in annual reports along with summarized IDDE tracking information.

Continue to implement and enforce ordinance and/or other regulatory mechanisms to prohibit illicit discharges to the MS4 throughout the permit term. Conduct a review of the existing enforcement mechanisms at least once during the permit term and update as necessary to meet the conditions of the MS4 Modified General Permit. If updates are identified take to Council for adoption by the end of the permit term, as necessary.

Continue to implement the current IDDE enforcement procedures and escalating enforcement matrix throughout the permit term while a review of the enforcement matrix is conducted. The review and updates of the matrix, if needed, will be completed by and submitted with the third annual report (November 1, 2023). The MS4 Modified General Permit extended this "by date" to the end of the permit term, November 28, 2024, if needed.

Development/Implementation Schedule

BMP ID1

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
ID1	Continue to implement existing IDDE response and enforcement program and conduct a program review to ensure compliance; identify program gaps and needs.		Finalize response and enforcement program review and update.	Continue response and enforcement program implementation.
	Develop an annual IDDE program review template to ensure permit requirements are being met; submit review summary in annual report(s).		Submit review summary in annual report.	Submit review summary in annual report.
	Annually summarize in the Annual Report the IDDE tracking information.			
	Continue to implement and enforce ordinance and/or other regulatory mechanisms to prohibit illicit discharges.			

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	Review existing IDDE ordinance and verify compliance with authority to investigate, require the elimination of illicit discharges, and define the range of illicit discharges it covers.	Finalize review of existing IDDE ordinances.	Code update and Council adoption if necessary - Modified Permit extended to Feb 28, 2024.	
ID1	Continue to implement current IDDE enforcement procedures and matrix.			
	Review and update enforcement procedures and matrix as necessary.	Finalize enforcement procedures and matrix updates and take to Council if needed.	By Nov. 1, 2023, submit enforcement procedures in 3 rd Annual Report. (Modified Permit extended to Feb 28, 2024).	

BMP ID2: MS4 Map**Responsible Parties**

Environmental Services, Operations, and Information Technology Divisions, under the direction of the Development and Public Works Department Division Director(s).

BMP Description

BMP ID2 – MS4 Map addresses MS4 infrastructure mapping requirements to have in place a stormwater infrastructure map that identifies piped and open MS4 systems and stormwater controls such as water quality facilities. The City will continue ongoing GIS mapping and inventory of its MS4 storm system infrastructure(s). Staff will review mapping and inventory requirements as listed in the MS4 Modified General Permit and identify mapping gaps and update mapping layers as needed. Staff will perform any in-field or desktop data gathering as needed to incorporate information in the UGB expansion areas and finish re-defining storm basins. Additionally, under this BMP the dry-weather mapping requirement to identify priority point locations will be incorporated into a mapping layer.

This BMP covers activities to meet Schedule A.3.c.ii of the Modified MS4 General Permit.

Existing Conditions

The City has had in place since its implementation of the Individual NPDES permit a GIS mapping system for the public infrastructure. In 2010 the City began incorporating mapping of both public and private post-construction stormwater controls both vegetated and structural facilities. These mapping layers are maintained on an ongoing basis as City infrastructure expands and as private water quality post-construction facilities are constructed. Updates to improve major basin area, sub-basin area, outfall and system jurisdictional ownership, and facility location are currently being evaluated with current and planned updates to improve mapping accuracy and ownership.

Springfield completed a stormwater drainage system outfall field inventory in 2000, and updated in 2011, which involved a physical inspection of the entire open channel drainage system. At the same time, staff additionally inventoried and mapped the DEQ-permitted industrial source outfalls within the City's jurisdiction. Other completed inventories that included outfall assessment and location were the Dry Weather Outfall Inventory 2007 and Impact Assessment, Channel Assessment 2004, and Metro Channel Assessment 2005.

The City's Information Technology Division (GIS workgroup) continues to inventory and map the MS4 infrastructure that is installed as a result of development, construction and annexation as they are submitted in asbuilt (as-constructed) format and/or identified and verified by City field staff. Water Resources staff maintain and update the post-construction

stormwater control layers that provide inventory and inspection information for both public and private water quality facilities (vegetated and structural).

Proposed MS4 Plan Activities

MS4 infrastructure mapping updates will be ongoing as new development and redevelopment result in the construction of new stormwater drainage systems. This type of inventory updating will be provided by the City's Information Technology GIS workgroup as as-built and field information is submitted to them and by the Water Resources Division as water quality facilities are constructed.

Staff will review mapping and inventory requirements that are listed in the MS4 Modified General Permit and identify gaps and update the City's inventory information as needed. Staff will perform any in-field or desktop data gathering as needed to incorporate information in the UGB expansion areas and finish re-defining storm system basins. Staff will submit the MS4 Map to the DEQ. Additionally, under this BMP the dry-weather mapping requirement to identify priority point locations will be incorporated into a mapping layer.

Measurable Goals

Continue ongoing GIS mapping and inventory of MS4 storm system infrastructure(s) throughout the permit term. By the end of the permit term review mapping and inventory requirements as listed in the MS4 Modified General Permit and identify mapping gaps and update the City's inventory information, as needed. Perform any in-field or desktop data gathering as needed to incorporate information in the UGB expansion areas and finish re-defining storm system basins by the end of the permit term. Dry-weather priority point locations will be identified under ID3 – Dry-weather Outfall Screening and incorporated into a mapping layer by the end of the permit term. Submit MS4 map to the DEQ with a goal by date of November 1, 2023 (third annual report); the MS4 Modified General Permit extended this "by date" to the end of the permit term, if needed to February 28, 2024.

Development/Implementation Schedule

BMP ID2:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
ID2	Ongoing City GIS mapping and inventory of storm system infrastructure(s).			

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	Review mapping and inventory requirements and identify gaps and needs; update as needed.		Finalize review; include mapping standards in SWMP by Nov 1, 2022	No action unless mapping updates not completed – Modified Permit extended map submittal to Feb 28, 2024
	Perform any in-field or desktop data gathering as needed. (UGB expansion area) Finish re-defining storm system basins.		Finalize any in-field or desktop data gathering as needed.	No later than Nov 1, 2023 – submit MS4 map with the 3 rd annual report. Modified Permit extended submittal to Feb 28, 2024, if needed.

BMP ID3: Dry Weather Screening Program**Responsible Parties**

Under the direction of the Development and Public Works Department Division Director(s), Environmental Services and Operations Divisions.

BMP Description

This BMP addresses the requirement to have a dry-weather screening program in place to aid in the identification and elimination of illicit discharges. It will focus on the development of a dry-weather screening program that includes a pollutant parameter action level list, identifying field screening locations, dry weather screening of 40% of MS4 outfalls, and annual field screening of the priority locations. Additionally, staff will develop a training strategy, which is part of a larger internal staff training strategy, to ensure persons involved in IDDE implementation are trained.

This BMP covers activities to meet Schedule A.3.c.vi-vii of the Modified MS4 General Permit.

Existing Conditions

The City typically identifies illicit discharges by pollution reports/incidents, through inspections conducted by Industrial Pretreatment, through observations made by staff working daily in the field, and through inspections conducted as part of the Water Quality Facility Management Program. City staff have addressed these discharges in several ways, including:

- Providing educational information about the prohibition on discharging pollutants to the stormwater drainage system and protection of local waterways.
- Providing technical assistance to businesses/industries to help locate the sources of illicit discharges and to identify BMPs available to resolve them.
- Streamlining stormwater pollution prevention outreach messages (and associated regulations) by collaborating with regional partners such as the City of Eugene and Lane County.
- Conducting enforcement activities as needed to address noncompliance.

Springfield has completed past waterway and outfall assessments within its UGB. From these assessments and inventories Springfield updated its infrastructure mapping, eliminated identified illicit discharges, identified areas that could benefit from enhancements such as tree planting to improve temperature, and stewardship opportunity locations.

Proposed MS4 Plan Activities

The City will continue to respond to reports of pollution in the stormwater drainage system and will endeavor to identify and eliminate the sources through educational outreach, technical assistance, and enforcement actions as needed. This BMP will focus on the development of a dry-weather screening program that includes the development of a pollutant parameter action level list, identifying field screening locations, and annual field screening of the priority locations. Additionally, staff will develop a training strategy, which is part of a larger internal staff training strategy, to ensure persons involved in IDDE implementation are trained.

Measurable Goals

Develop a dry-weather screening program; identify MS4 outfalls and priority locations by the end of the second fiscal year and have the program finalized and ready to implement field screening of outfalls, with a goal date of the third fiscal year. During the third fiscal year begin outfall screening to achieve 40% of the MS4 outfalls screened by the end of the permit term. The dry-weather screening program includes the development of a pollutant parameter action level list by the end of the second fiscal year and submittal of the list to the DEQ by November 1, 2022.

Incorporate IDDE training into the internal staff training strategy, which is part of a larger training strategy, and complete by the end of the second fiscal year with the insurance of at least once during the permit term persons involved in IDDE implementation are trained.

Development/Implementation Schedule

BMP ID3:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
ID3	Develop a dry-weather screening program; identify outfalls and priority locations.		Finalize and implement a field screening program.	Implement a field screening program. (Modified permit extended to Feb 28, 2024)
	No action.		Conduct field screening of 40% of MS4 outfalls. (Modified permit ext. to Feb 28, 2024)	

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	Develop Pollutant Parameter Action Level list.	Finalize Pollutant Parameter Action Level list.	By Nov 1, 2022 submit Pollutant Parameter Action Level list.	No action
ID3	Incorporate IDDE training into the internal staff training strategy	Finalize training strategy. Modified Permit extended to Feb 28, 2024 if needed.	Train IDDE and screening field staff at least once during the permit term.	

BMP ID4: Non-Stormwater Discharge Assessment**Responsible Parties**

Environmental Services Division, under the direction of the Development and Public Works Department Division Director.

BMP Description

This BMP was developed to address the assessment of non-stormwater discharges that are considered by the DEQ as allowable non-stormwater discharges in the MS4 Modified General Permit Schedule A.1.d. Allowable Non-Stormwater Discharges. The permit language notes that the discharges are considered allowable unless any of the discharges become a significant source of pollutants. If such a determination is made, then the permit registrant must take appropriate actions to prohibit the discharge or require implementation of appropriate BMPs to reduce the discharge of said pollutant(s). This BMP will ensure the review and updates, if needed, of the existing Non-Stormwater Discharge Assessment Report.

Existing Conditions

The City's Municipal Code contains provisions prohibiting discharges to the stormwater drainage system that are deleterious, pose a threat to health, safety, public welfare, or the environment. In 2009 and updated in 2010, while under the Individual Permit Springfield conducted an assessment of the discharges listed in the permit as being allowable stormwater discharges. The Environmental Services Division completed a report: *Non-Stormwater Discharges Assessment Evaluation* that assessed each of the listed activities. The report measured how the City views the activity in regard to water pollution, and what actions are required if the discharge is allowed including what type of pollution control BMP should be applied.

Additionally, staff drafted a product assessment which is similar to the non-stormwater discharge assessment that looked into the use of certain outdoor products and applications such as snow/ice control, moss control, and dust control and assessed the impacts pertaining to water quality and provides user guidance.

MS4 Plan Activities

The City will continue to implement and enforce the pollution control BMP's as listed in the *Non-Stormwater Discharges Assessment Evaluation* report. Water Resource staff will review and make an assessment of non-stormwater discharges that are considered by the DEQ as allowable non-stormwater discharges as listed in the MS4 Modified General Permit

Schedule A.1.d. Allowable Non-Stormwater Discharges and update the assessment evaluation report if needed. The City will continue to evaluate additional types of non-stormwater discharges as they arise during permit term and work to determine whether they need to be prohibited, have BMP controls, or do not pose a threat to the stormwater system.

Additionally, Water Resources staff will review and update, if needed, the *Non-Stormwater Discharge Product Assessment* report.

Measurable Goals

Ongoing implementation of the *Non-Stormwater Discharge Assessment Evaluation* and the *Product Assessment* reports throughout the permit term. Review the *Non-Stormwater Discharge Assessment Evaluation*, update as needed by the end of the second fiscal year. Review the *Non-Stormwater Discharge Product Assessment*, update as needed by the end of the second fiscal year.

Development/Implementation Schedule

BMP ID4:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
ID4	Ongoing implementation of the Non-Stormwater Discharge Assessment Evaluation and the Product Assessment Evaluation reports.			
	Review Non-Stormwater Discharge Assessment document, update as needed.		Continue to implement actions according to the Non-Stormwater Discharge Assessment.	
	Review Product Assessment Document, update as needed.		Continue to implement actions according to the Product Assessment.	

Minimum Control Measure #4: Construction Site Stormwater Runoff Control

Regulation: Modified MS4 General Permit - Schedule A.3.d.

“The permit registrant must implement and enforce a construction site runoff control program to reduce discharges of pollutants from construction sites in its coverage area. Existing permit registrants must continue to implement their construction site runoff program as they develop and implement the requirements of Schedule A.3.d.”

This Modified General Permit Schedule further identifies:

- Ordinance or other regulatory mechanism that requires erosion controls, sediment controls, and waste materials management controls to be used and maintained at all qualifying construction projects from initial clearing through final stabilization. For Large Communities, this threshold is 7,000 square feet or more.
- Compliance with other NPDES permit by referring construction projects that disturb one or more acres (or that disturb less than one acre, if it is part of a “common plan of development or sale” disturbing one or more acres), to the DEQ.
- Process to maintain written specifications that address the proper installation and maintenance of erosion and sediment controls during all phases of construction activity.
- Process for review of erosion and sediment control plans for construction projects that will result in land disturbance of one or more acres (or that disturb less than one acre if it is part of a “common plan of development or sale” disturbing one or more acres).
- Construction site inspections triggers, documentation, and additional inspection requirements for existing large communities of at least 25% of the qualifying new construction sites that disturb less than one acre at least once during the permit term.
- Written escalating enforcement and response procedure that address repeat violations.
- Training and education of responsible key staff.

This section also requires program tracking, assessment, and reporting: *“The permit registrant must track implementation of the construction site runoff program’s required activities. In each corresponding annual report, the permit registrant must assess their progress toward implementing the construction site runoff program’s control measures”.*

Applicable City of Springfield MS4 Plan BMPs

Construction Stormwater (CSW):

CSW1 -- Erosion and Sediment Control Regulations

CSW2 -- Land Drainage Alteration Permit (LDAP) Program and Plan Review

CSW3 -- Inspections and Enforcement

CSW4 -- City Staff Erosion Control Training

Rationale

The City of Springfield selected the above four BMPs to address each component of the construction site runoff control requirements listed in the Modified MS4 General Permit. CSW1, 2 and 3 address regulatory authority for implementation and enforcement of Springfield's erosion and sediment control program which is provided in both the Development and Municipal Codes. These Codes provide a framework for oversight of construction that requires erosion and sediment control measures during construction or redevelopment of sites. Specific requirements for construction site operators are addressed during the Site Plan Review and Land Division review processes and are included in the City's Engineering Design Standards and Procedures Manual, which is referenced in the Springfield Development Code.

Land Drainage and Alteration Permits (LDAP) require implementation of erosion and sediment control plans. Over the counter permits implement a pre-approved ESC standard plan (template) that is included in the application. Additionally, the multiple sections of the Municipal Code provide authority to regulate construction sites to prevent or control wastes that can adversely impact water quality. Taken together, these adopted Codes and programs fulfill requirements for an effective erosion and sediment control program. With the issuance of the Modified General Permit Springfield will need to conduct a review of its codes and standards to ensure compliance with the MS4 permit and make updates if needed. These three BMPs also include ongoing program implementation and site inspections of the existing codes and standards that are in place while the review process takes place.

Under CSW4 ongoing training will continue; training of City staff to recognize and correct erosion problems on construction sites and to enforce the provisions of the City's adopted ordinances is a critical component of a stormwater management program. Currently this is being addressed through dedicated staff for permitting, inspections, education, and enforcement. CSW4 will ensure continued training of City staff and also includes improvements to outreach and education for the private sector. Additionally, CSW4 provides for an annual program review and reporting.

Responsible Parties

The Development and Public Works Department's Community Development Division maintains the Springfield Development Code and coordinates the Site Plan and Land Division review process. It is responsible for implementation and inspection of approved land alteration and development projects for erosion and sediment control, as well as construction site runoff controls. Enforcement of the City's Codes is conducted in coordination with the Office of the City Attorney.

Summary of Measurable Goals

Land and Drainage Alteration Program (LDAP) staff will continue to provide permit services, plan review, inspection, tracking, and enforcement of the Erosion and Sediment Control Program throughout the permit term.

Staff will review the Municipal Code, Springfield Development Code, and the Springfield Engineering Design Standards and Procedures Manual provisions related to erosion control and construction site runoff and compare them to the Modified MS4 General Permit requirements, at least one time during the permit term. Updates will be made and taken to Council, if appropriate, by the end of the permit term.

Staff will verify process for referral compliance with Other NPDES Permits for construction projects that disturb one or more acres (or that disturb less than one acre but are part of a common plan of development. The referral process will be ongoing throughout the permit term.

Staff will submit the LDAP escalating enforcement procedures with the 3rd Annual Report (Nov. 1, 2023). Note that the Modified General Permit extended this “by date” to Feb. 28, 2024, if needed.

Within resources, the City plans to maintain professional CESCL certification and training requirements for dedicated staff that work the LDAP Program. Staff plan to incorporate erosion and sediment control education into an internal training strategy, which is part of a larger staff training strategy to ensure training is provided at least one time during the permit term. Increase outreach and education to the private sector through the continued development and distribution of factsheets, brochures and through mailings.

Develop a Construction Site Runoff Program review template; assess progress towards implementation of the program and provide a summary in the annual reports.

Development/Implementation Schedule Summary (permit year modified based on permit issuance date)

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
CSW1	Continue to implement existing Municipal Code and Spfld. Development Code provisions for construction activities. Ongoing implementation of existing LDAP Program.			

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	Review existing LDAP Program, MC, and SDC to ensure a program for construction activities that results in construction project sites that results in a minimum land disturbance of 7,000 sqft, and meet the requirements listed in the MS4 Modified Permit.		Update codes and standards to ensure compliance with permit conditions; if needed, take to Council for re-adoption.	Carry over update of code and standards if needed - Modified General Permit extended to Feb. 28, 2024.
	Verify process for referral compliance with other NPDES Permits for construction projects that disturb one or more acres (or that disturb less than one acre but are part of a common plan of development). Ongoing DEQ referrals as needed.		Ongoing DEQ referrals as needed.	
CSW2	Ongoing implementation of LDAP Program runoff controls and site plan review.			
	Review existing Erosion and Sediment control requirements and process to ensure compliance with MS4 Modified General Permit Erosion and Sediment Control Plan requirements and Plan Review Process.		If needed, update requirements for erosion and sediment control requirements and plan review process; take to Council for adoption if appropriate by February 28, 2023 (Modified General Permit extended to Feb. 28, 2024).	
CSW3	Ongoing implementation of LDAP Program Construction Site Inspections and Enforcement Procedures; track violations and compliances for construction related activities. Ensure that 25% of construction sites that disturb less than one acre are inspected at least once during the permit term.			
	Review LDAP Program to ensure compliance with Construction Site Inspections and Enforcement Procedure components		If needed, update site inspections and enforcement procedure requirements and components; take to Council for adoption if appropriate by February 28, 2023 (Modified General Permit extended to Feb. 28, 2024).	
	No Action		Submit LDAP escalating enforcement procedures with the 3rd Annual Report (Nov. 1, 2023) (Modified General Permit extended to Feb. 28, 2024).	

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
CSW4	Maintain professional CESCL certification and training requirements.			
	Increase outreach and education to the private sector through the continued development and distribution of factsheets, brochures and mailings. Review and update materials as needed. Part of PE2: Public Education and Outreach on Pollution Prevention and Stormwater.			
	Incorporate erosion and sediment control education and training into the internal staff training strategy.		Provide training, at least once during the permit term, to all persons involved in ECS implementation.	
	Develop a Construction Site Runoff Program review template; assess progress towards implementation of the program and provide summary in annual report(s).		Provide Construction Site Runoff Program review summary in annual report(s).	

BMP CSW1: Erosion and Sediment Control Regulations**Responsible Parties**

The Development and Public Works Department's Community Development Division maintains the Springfield Development Code and coordinates the Site Plan and Land Division review process. It is responsible for implementation and inspection of approved land alteration and development projects for erosion and sediment control, as well as construction site runoff controls. Enforcement of the City's Codes is conducted in coordination with the Office of the City Attorney.

BMP Description

This BMP is intended to provide for maintenance, review and augmentation of City Ordinances and Codes adopted to enable administration and enforcement of programs aimed at reducing and/or eliminating erosion and sedimentation associated with both public and private construction or other land alteration, as well as construction site waste. Specifically, this BMP will review existing Municipal Code and Springfield Development Code to ensure a program for construction activities that results in construction project sites that results in a minimum land disturbance of 7,000 sq ft, and meet the requirements listed in the MS4 Modified Permit for construction site runoff control and ensure a process for referral compliance with other NPDES permits for construction projects that disturb one or more acres (or that disturb less than one acre but are part of a common plan of development).

This BMP covers activities to meet Schedule A.3.d.ii-iii of the Modified MS4 General Permit.

Existing Conditions

Regulatory authority for implementation and enforcement of Springfield's erosion and sediment control program is provided in both the Development and Municipal Codes. These Codes provide a framework for oversight of construction that requires erosion and sediment control measures during construction or redevelopment of sites as determined by 8.302 of the Springfield Municipal Code. Specific requirements for construction site operators are addressed during the Site Plan Review and Subdivision review processes.

Provisions enabling inspections and enforcement of required erosion and sediment control BMP measures and environmental compliance of construction activities are included in the Municipal Code. Violations are enforced through re-inspection fees, stop work orders, and/or citations.

Additional provisions addressing design and pollution control BMP's are outlined in the Engineering Design Standards and Procedures Manual (EDSPM).

Additionally, the City currently refers and ensures that construction projects that disturb one or more acres (or that disturb less than one acre but are part of a common plan of development) are referred to the DEQ for 1200C permitting.

Proposed MS4 Plan Activities

The City will continue to implement existing regulations on an ongoing basis. City staff will also review the existing Codes, procedural manuals, and Ordinances, and will amend and/or adopt as appropriate to ensure a program for construction activities that results in construction project sites that results in a minimum land disturbance of 7,000 square feet and meet the regulatory code requirements listed in the MS4 Modified Permit.

Measurable Goals

Continue to implement existing Municipal Code and Springfield Development Code provisions for construction activities throughout the permit term. Review the existing LDAP Program, Municipal Code, and Springfield Development Code to ensure that construction project sites that result in a minimum land disturbance of 7,000 sq.ft. meet the requirements listed in the MS4 Modified Permit by the end of the second fiscal year. Updates, if needed, to existing codes and standards will be made to ensure compliance by the end of the permit term.

Verify current process for referral compliance with other NPDES permits for construction projects that disturb one or more acres (or that disturb less than one acre but are part of a common plan of development) by the end of the second fiscal year. DEQ referrals will be ongoing as needed, throughout the permit term.

Development/Implementation Schedule

BMP CSW1:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
CSW1	Continue to implement existing Municipal Code and Spfld. Development Code provisions for construction activities. Ongoing implementation of existing LDAP Program.			

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	Review existing LDAP Program, MC, and SDC to ensure a program for construction activities that results in construction project sites that results in a minimum land disturbance of 7,000 sqft, and meet the requirements listed in the MS4 Modified Permit.		Update codes and standards to ensure compliance with permit conditions; if needed, take to Council for re-adoption.	Carry over update of code and standards if needed - Modified General Permit extended to Feb. 28, 2024.
	Verify process for referral compliance with other NPDES Permits for construction projects that disturb one or more acres (or that disturb less than one acre but are part of a common plan of development). Ongoing DEQ referrals as needed.		Ongoing DEQ referrals as needed.	

BMP CSW2: Land Drainage Alteration Permit (LDAP) Program and Plan Review**Responsible Parties**

The Development and Public Works Department's Community Development Division maintains the Springfield Development Code and coordinates the Site Plan and Land Division review process. It is responsible for implementation and inspection of approved land alteration and development projects for erosion and sediment control, as well as construction site runoff controls. Enforcement of the City's Codes is conducted in coordination with the Office of the City Attorney.

BMP Description

This BMP provides for ongoing implementation of a permitting program requiring erosion and sediment control measures for construction and other land alteration activities. Regulatory authority for implementation and enforcement of Springfield's erosion and sediment control program are provided in both the Development and Municipal Codes. These Codes provide a framework for oversight of construction that requires erosion and sediment control measures during construction or redevelopment including requirements to provide erosion and sediment control plans and have a site plan review process.

This BMP also includes ongoing program implementation of the existing codes and standards requiring erosion and sediment control plans and the plan review processes that are currently in place while a review of these existing processes takes place, and if appropriate, updates made.

This BMP covers activities to meet Schedule A.3.d.vi-v of the Modified MS4 General Permit.

Existing Conditions

Land Drainage Alteration Permits (LDAPs) have been required for land disturbing construction activities for many years, under provision of Municipal Code Section 8 - Grading. These permits require Erosion and Sedimentation Control Plans (ESCP) showing erosion control measures and work practices that will be implemented at the site and a review and approval process for the submitted plans. The LDAP program was developed and implemented as a coordinated effort between the Development Services and Public Works Departments.

City Council authorized dedicated staff to provide for implementation and enforcement of the LDAP program. Staff was hired and received professional training, Municipal Code and Development Code has been revised and adopted, and erosion and sediment control BMP guidelines have been incorporated into the City's Engineering Design Standards and

Procedural Manual. Additionally, staff drafted an LDAP Program document that provides the history, program, inspection, enforcement, record keeping, and other program procedures and processes for the LDAP Program.

Specific requirements for construction site operators are addressed during the Site Plan Review and Land Division review processes and are included in the City's Engineering Design Standards and Procedures Manual, which is referenced in the Springfield Development Code. Land Drainage and Alteration Permits are required per sections 8.3 and 8.4 of the Springfield Municipal Code (SMC). Permits are required for all grading that is intended to support a structure or for any other grading that does not meet the exemptions listed in the SMC. Site-specific erosion and sediment control plans are required with all LDAP submittals that exceed one acre of disturbance or are within sensitive areas as defined by the SMC. Sites outside of sensitive areas are eligible for a TYPE 2 LDAP, which includes a standard, pre-approved erosion and sediment control plan (template).

Proposed MS4 Plan Activities

With the issuance of the Modified General Permit Springfield will conduct a review requiring erosion and sediment control site plans and the current process to ensure compliance with site plan review and approval process. The City will continue with ongoing program implementation of the existing code and standard requirements for site plan submittal, review, and approval that are in place while the review and updates, if needed take place.

Measurable Goals

Ongoing implementation of LDAP Program runoff controls and site plan review throughout the permit term. Review existing erosion and sediment control requirements and process to ensure compliance with MS4 Modified General Permit Erosion and Sediment Control Plan requirements and Plan Review Process by the end of the second fiscal year. If needed, update requirements for erosion and sediment control requirements and plan review process; take to Council for adoption if appropriate by February 28, 2023 (Modified General Permit extended to Feb. 28, 2024).

Development/Implementation Schedule

BMP CSW2:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
CSW2	Ongoing implementation of LDAP Program runoff controls and site plan review.			
	Review existing Erosion and Sediment control requirements and process to ensure compliance with MS4 Modified General Permit Erosion and Sediment Control Plan requirements and Plan Review Process.		If needed, update requirements for erosion and sediment control requirements and plan review process; take to Council for adoption if appropriate by February 28, 2023 (Modified General Permit extended to Feb. 28, 2024).	

BMP CSW3: Inspections and Enforcement**Responsible Parties**

The Development and Public Works Department's Community Development Division maintains the Springfield Development Code and coordinates the Site Plan and Land Division review process. It is responsible for implementation and inspection of approved land alteration and development projects for erosion and sediment control, as well as construction site runoff controls. Enforcement of the City's Codes is conducted in coordination with the Office of the City Attorney.

BMP Description

This BMP provides for ongoing implementation of a permitting program requiring erosion and sediment control measures for construction and other land alteration activities. The program includes inspections of site work and enforcement of City regulations to ensure that erosion and sediment control measures are protective of property and water quality. Continue to implement Code authority to regulate and enforce rules related to construction site management with respect to site runoff, pollution prevention, erosion prevention, sediment control, and the protection of natural resources.

With the issuance of the Modified General Permit Springfield will need to conduct a review of its codes and standards to ensure compliance with the modified permit and make updates if needed. This BMPs includes ongoing program implementation of the existing codes and standards addressing inspections and enforcement while a review and if needed update process is implemented. This BMP ensures ongoing inspection, enforcement, compliance, and reporting for construction site activities, and the review and submittal of Springfield's construction site enforcement matrix to the DEQ.

This BMP covers activities to meet Schedule A.3.d.vi-vii of the Modified MS4 General Permit.

Existing Conditions

Regulatory authority for implementation and enforcement of Springfield's erosion and sediment control program is provided in both the Development and Municipal Codes. These Codes provide a framework for oversight of construction activities subject to LDAP permit requirements. Provisions enabling inspections and enforcement of required erosion and sediment control BMP measures and environmental compliance of construction activities are included in the Municipal Code. Violations are enforced through "stop work" orders and/or citations.

Additional provisions addressing the proper design, installation, and maintenance of erosion prevention, sediment control, and pollution prevention BMP's are outlined in the Engineering Design Standards and Procedures Manual (EDSPM).

The Code authority in the Springfield Municipal Code prohibits the disposal of nuisance waste on public or private property, including stormwater drainageways. The Municipal Code includes provisions for nuisance management at all public and private properties including construction sites. Additional inspections and educational compliance efforts are provided for these by Environmental Services and Operations Division staff. Violations are enforced through an escalating enforcement matrix, as appropriate.

Additionally, the LDAP Program document provides the history, program, inspection, enforcement, record keeping, and other program procedures and processes for the LDAP Program. Currently Springfield inspects all permitted sites regularly, inspection frequency is not specified in code.

Proposed MS4 Plan Activities

Staff will continue to implement the LDAP Program Construction Site Inspections and Enforcement Procedures; track violations and compliances for construction related activities while a review of the inspections and enforcement procedures is conducted. If needed, update site inspections and enforcement procedure requirements and components; take to Council for adoption if appropriate. Inspection of at least 25% of construction sites that disturb less than one acre will continue to be implemented. The enforcement matrix will be reviewed and updated as needed and submitted to the DEQ with the third annual report.

Measurable Goals

Continue to track, enforce, and inspect construction sites and investigate and enforce construction related nuisance violations throughout the permit term; ensure that 25% of construction sites that disturb less than one acre are inspected at least once during the permit term. Review the inspections and enforcement procedures by the end of the second fiscal year and if needed, update procedure requirements and components; take to Council for adoption if appropriate by the end of the permit term. The enforcement matrix will be reviewed and updated as needed and submitted to the DEQ with the third annual report.

Development/Implementation Schedule

BMP CSW3:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
CSW3	Ongoing implementation of LDAP Program Construction Site Inspections and Enforcement Procedures; track violations and compliances for construction related activities. Ensure that 25% of construction sites that disturb less than one acre are inspected at least once during the permit term.			
	Review LDAP Program to ensure compliance with Construction Site Inspections and Enforcement Procedure components.		If needed, update site inspections and enforcement procedure requirements and components; take to Council for adoption if appropriate by February 28, 2023 (Modified General Permit extended to Feb. 28, 2024).	
	No Action		Submit LDAP escalating enforcement procedures with the 3rd Annual Report (Nov. 1, 2023) (Modified General Permit extended to Feb. 28, 2024).	

BMP CSW4: City Staff Erosion Control Training**Responsible Parties**

The Community Development Division is responsible for implementation and inspection of approved land alteration and development projects for erosion and sediment control, as well as construction site runoff controls.

BMP Description

This BMP entails provision of adequate and ongoing erosion control training opportunities so staff can educate and inform contractors and developers; fairly and knowledgeably enforce the City's Codes and regulations; and conduct their work in a responsible manner. Additionally, this BMP provides for an annual program review to assess program implementation and annual reporting.

This BMP covers activities to meet Schedule A.3.d.viii-ix of the Modified MS4 General Permit.

Existing Conditions

LDAP staff has received and are certified under the Certified Erosion and Sediment Control Lead (CESCL) training program. Erosion control training for other City staff is important to help staff recognize potential erosion problems, as well as avoid creating those problems during the course of their work. Training is provided internally on specific activities or issues and is part of the ongoing employee development program on a routine basis for new and experienced staff. The goal is to ensure that staff are adequately informed of the regulations, and have the tools, supplies, and knowledge to avoid creating unnecessary erosion. Trainings and education also support staff in constructively educating citizens and the development community with regard to appropriate and required erosion control measures. Public educational documents are readily available on the city webpage and as handouts over the counter.

Proposed MS4 Plan Activities

The dedicated staff for the LDAP program that are CESCL certified will continue to maintain their certification and training requirements within funding resources. LDAP staff will also take the lead in providing awareness training to Operations field staff as needed, either by presentations and/or hands on site training. Awareness training will allow field staff to be adequately informed of the regulations and have the tools, supplies, and knowledge to prevent erosion and stormwater pollution during routine maintenance activities. LDAP staff will also increase outreach and education to the private sector through the continued

development, review, and distribution of factsheets, brochures and through mailings. Staff will develop a Construction Site Runoff Program review template; assess progress towards implementation of the program and provide summary in annual report(s).

Measurable Goals

Continue to maintain a comprehensive and professional level of erosion control training for LDAP staff so that the City's inspection, enforcement, and technical assistance activities are implemented consistently throughout the organization and the development community throughout the permit term. Incorporate erosion and sediment control education and training into the internal staff training strategy, which is part of a larger strategy for training internal staff by the end of the second fiscal year, and provide training, at least once during the permit term, to persons involved in ESC implementation.

Throughout the permit term, increase outreach and education to the private sector through activities such as the development and distribution of factsheets, brochures, and mailings. Construction site education and outreach will be conducted and tracked under the education and outreach control measure. Develop a Construction Site Runoff Program review template by the end of the second fiscal year and annually assess progress towards implementation of the program and provide summary in annual report(s).

Development/Implementation Schedule

BMP CSW4:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
CSW4	Maintain professional CESCL certification and training requirements.			
	Increase outreach and education to the private sector through the continued development and distribution of factsheets, brochures and mailings. Review and update materials as needed. Part of PE2: Public Education and Outreach on Pollution Prevention and Stormwater.			
	Incorporate erosion and sediment control education and training into the internal staff training strategy.		Provide training, at least once during the permit term, to all persons involved in ECS implementation.	
	Develop a Construction Site Runoff Program review template; assess progress towards implementation of the program and provide summary in annual report(s).		Provide Construction Site Runoff Program review summary in annual report(s).	

Minimum Control Measure #5: Post-Construction Stormwater Management for New Development and Redevelopment

Regulation: Modified MS4 General Permit - Schedule A.3.e.

“Existing permit registrants must continue to implement their post-construction stormwater pollutant control program as they develop programs to meet the requirements of Schedule A.3.e to reduce discharges of pollutants and address stormwater runoff from new development and redevelopment project sites in its coverage area.”

This Modified General Permit Schedule further identifies:

- Must require the following for project sites discharging stormwater to the MS4 that create or replace 5,000 square feet or more of impervious surface area through ordinance or other regulatory mechanism:
 - The use of structural stormwater controls at all qualifying sites.
 - A site-specific stormwater management approach that targets natural surface or predevelopment hydrological function through the installation and long-term maintenance of structural stormwater controls.
 - Long-term operation and maintenance of structural stormwater controls at project sites that are under the ownership of a private entity.
- Removal of barriers to low impact development.
- Must develop enforceable post-construction stormwater management requirements in ordinance or other regulatory mechanism that, at a minimum, include site performance standards, treatment standards, offsite mitigation alternative compliance, and off-site stormwater mitigation options.
- That the ordinance or other regulatory mechanism include procedures for the review and approval of structural stormwater control plans for new development and redevelopment projects.
- Must maintain an inventory and implement a strategy to ensure that all structural stormwater controls installed in compliance with this permit are operated and maintained to meet the site performance standard listed in the permit.
- Training and education of responsible key staff.

This section also requires program tracking and reporting: *“must maintain records for activities conducted to meet the requirements of the Post-Construction Site Runoff program and include a descriptive summary of their activities in the corresponding Annual Report.”*

Applicable City of Springfield MS4 Plan BMPs

Development Standards (DS):**DS1 – Post Construction Stormwater Management Codes and Standards****DS2 - Post Construction Stormwater Facility Long-Term Operation and Maintenance****DS3 – Post Construction Stormwater Management Training, Tracking, and Assessment****Rationale**

The City selected the above three BMPs to meet the post-construction minimum control measure requirements. The Springfield Development Code requires that new developments incorporate stormwater management BMPs to reduce the impacts associated with stormwater runoff generated at the site.

BMP DS1 – Post Construction Stormwater Codes and Standards provide for ongoing implementation of the appropriate Development Code requirements and the more specific design requirements included in the Engineering Design Standards and Procedures Manual, such that pollutants from stormwater runoff from new development are reduced to the maximum extent practicable. The Modified MS4 General Permit requires specific post management retention and treatment standards whereas Springfield's current standards may not be as specific. Under this BMP code pertaining to site plan review, treatment standards, and off-site mitigation will be reviewed and compared to the Modified Permit and updated as needed to ensure compliance.

BMP DS2 -- Post Construction Stormwater Facility Long-Term Operation and Maintenance provides for ongoing implementation and the review of a long-term inspection and enforcement program. Under this BMP Springfield plans for the review, and if needed, update of the current operational and maintenance provisions that are in Springfield's code and standards. Springfield has in place a Water Quality Facility Management Program that provides for inventory and inspection of both public and private facilities. A review of the Water Quality Facility Management Program will also be done to ensure it is consistent with code and permit requirements.

BMP DS3 – Post Construction Stormwater Management Training, Tracking, and Assessment was selected to address ongoing training and reporting requirements. Staff has received training and implement an effective stormwater management inventory and inspection program that addresses both public and private water quality facilities. To maintain an effective program staff will need to receive periodic training and education, this BMP will provide for ongoing training as needed. The City's inventory and inspection program tracks facilities that are installed and require ongoing long-term maintenance. This program is captured in a GIS program that tracks both facility information and inspection. Additionally, the Modified MS4 General Permit requires program assessment to assess program implementation and annual reporting to the DEQ of specific information. This BMP will ensure ongoing tracking, program assessment, and reporting.

Responsible Parties

The City's Community Development Division maintains the Springfield Development Code and coordinates the Site Plan and Land Division review process. The Environmental Services Division is responsible for implementing an inventory and inspection program. Enforcement of the City's Codes is conducted in coordination with the Office of the City Attorney and Code Enforcement.

Summary of Measurable Goals

The regulatory framework for control of post-construction stormwater runoff is contained in the Springfield Development and Municipal Codes, and the Engineering Design Standards and Procedures Manual. This framework will be reviewed, refined, and expanded as needed to improve the City's capability to achieve reductions in stormwater pollution from new developments to the MEP.

Goals include:

- 1) Continue to implement post-construction requirements for development and redevelopment while current Codes and standards are reviewed and updated if needed. This review will include requirements for project sites discharging stormwater to the MS4 that create or replace 5,000 square feet or more of impervious area.
- 2) Review development code and remove of barriers to low impact development.
- 3) Review and update as needed, enforceable post-construction stormwater management requirements in ordinance or other regulatory mechanism that includes site performance standards, treatment standards, offsite mitigation alternative compliance, and off-site stormwater mitigation options.
- 4) Maintain an inventory and inspection program for long-term operations and maintenance.
- 5) Train and educate responsible key staff.

Development/Implementation Schedule Summary (permit year modified based on permit issuance date)

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
DS1	Continue to implement post-construction requirements for development and redevelopment.			
	Review, as needed, existing Post-Construction Codes and Standards to ensure compliance with required post construction authority, LID requirements, and identify, minimize or eliminate ordinance, or code and development standard barriers to low impact development.			No Action
	Continue to implement current site plan review process for post-construction for development and redevelopment.			
	Review site plan review process(s) and ordinance to ensure compliance with permit requirement			No Action
	Review retention, treatment, and mitigation requirements of the permit and identify gaps, options, and needs.			No Action
	No Action		Draft findings and take to Council, as needed, for new program implementation by September 1, 2023 - Modified Permit extended to Feb 28, 2024.	
	Continue to implement the current WQF Management Program; continue inventorying, tracking inspections, and compliance activities annually.			
DS2	Review Dev. Code and EDSPM and see if updates to O&M language or requirements are needed.		Take updated O&M requirements to Council, if needed.	
	Review and update as needed the WQF Management Program to ensure compliance with processes for inspection, tracking, inventory, and reporting.			
	Incorporate Post-Construction Runoff education and training into the internal staff training strategy.		Provide training, at least once during the permit term, to persons involved in implementation.	
DS3	If a post-construction runoff control certification becomes available in Oregon, seek funding to have relevant O&M inspection staff certified.			
	Develop post-construction program review template to ensure we are meeting the permit requirements; assess progress towards implementation of the program in each annual report(s).		Assess progress towards implementation of the program in annual report.	Assess progress towards implementation of the program in annual report.

BMP DS1: Post Construction Stormwater Management Codes and Standards**Responsible Parties**

The City's Community Development Division maintains the Springfield Development Code and coordinates the Site Plan and Land Division review process. Enforcement of the City's Codes is conducted in coordination with the Office of the City Attorney.

BMP Description

This BMP is intended to ensure that adequate Springfield Development Code provisions and engineering/design standards are maintained to require new developments to incorporate stormwater quality and quantity management facilities (structural and non-structural) into site plans and is managed to minimize adverse impacts on the stormwater drainage system and preserve riparian function to the maximum extent practicable. The Springfield Development Code provisions ensure that land use / development proposals incorporate structural systems (such as oil/water separators) and vegetated systems (such as swales or wetlands) into site designs. The Engineering Design Standards and Procedures Manual provides specific guidance and flexible options to ensure the stormwater quality systems are structurally sound and effective at meeting the MEP objective.

This BMP will provide for continued implementation of post-construction requirements for development and redevelopment while current Codes and standards are reviewed and updated if needed. This review will include:

- a. Requirements for project sites discharging stormwater to the MS4 that create or replace 5,000 square feet or more of impervious surface to:
 - Use structural stormwater controls at all qualifying sites.
 - Implement a site-specific stormwater management approach that targets natural surface or predevelopment hydrological function.
 - Provide long-term operation and maintenance of structural stormwater controls, include sites that are under the ownership of a private entity.

It will also include a review and the removal of barriers to low impact development if appropriate, and review and updated as needed, enforceable post-construction stormwater management requirements in ordinance or other regulatory mechanism that, include site performance standards, treatment standards, offsite mitigation alternative compliance, and off-site stormwater mitigation options.

This BMP covers activities to meet Schedule A.3.e.ii-v of the Modified MS4 General Permit.

Existing Conditions

Since 1986, the Springfield Development Code has required development proposals to include appropriate stormwater management systems to reduce adverse water quantity and quality impacts of new developments on the stormwater drainage system. In 2002, and updated in 2009, the City enacted additional stormwater quality-related requirements in an effort to address CWA and ESA water quality and riparian area protection requirements. Also in 2002, and updated in 2006 and 2012, the City adopted the Engineering Design Standards and Procedures Manual to provide specifications and options for stormwater management systems and strategies that can meet the Springfield Development Code requirements. In 2012 there was development code specific to the Glenwood area that was adopted. The current Engineering Design Standards and Procedures Manual relies significantly on the experience of other communities, such as Portland and Eugene, Oregon, which have had long-standing stormwater quality management programs. Springfield currently refers to the Eugene Stormwater Manual for facility design of stormwater facilities.

In June 2021 Springfield was issued its Modified MS4 General Permit. Under the Post-Construction section of the permit, it lists specific requirements pertaining to retention and treatment of stormwater runoff and off-site mitigation. Springfield currently has these types of standards and mitigation options available but not as specific as listed in the Modified MS4 General Permit. Springfield will need to review its standards and Codes and adjust as needed.

Proposed MS4 Plan Activities

Over the course of the MS4 permit period, the City will continue to implement existing Development Code and Design Manual requirements relating to post-construction. Staff will review existing Post-Construction Codes and Standards to ensure compliance with required post construction authority, LID requirements, and identify, minimize or eliminate ordinance, or code and development standard barriers. The City will continue to implement current site plan review process for post-construction for development and redevelopment while reviewing current site plan review process(s), retention, treatment, and mitigation requirements and identify gaps, options, and needs. Staff will draft findings and take to Council, as needed.

This review will include:

- a. Requirements for project sites discharging stormwater that create or replace 5,000 square feet or more of impervious surface to:
 - Use structural stormwater controls at all qualifying sites.
 - Implement a site-specific stormwater management approach that targets natural surface or predevelopment hydrological function.
 - Provide long-term operation and maintenance of structural stormwater controls, include sites that are under the ownership of a private entity.
- b. Review and the removal of barriers to low impact development.
- c. Review and updated as needed, site performance standards, treatment standards, offsite mitigation alternative compliance, and off-site stormwater mitigation options.

- d. Approval of structural stormwater control plans for new development and redevelopment projects.

Measurable Goals

Continue to implement existing post-construction requirements and site plan review process for development and redevelopment throughout the permit term.

Review, as needed, by the end of the third fiscal year:

- Existing Post-Construction Codes and Standards to ensure compliance with required post construction authority, LID requirements, and identify, minimize or eliminate ordinance, or code and development standard barriers to low impact development.
- Site plan review process(s) and ordinance.
- Retention, treatment, and mitigation requirements.

Draft findings and take to Council, as needed, for program implementation by September 1, 2023 - Modified Permit extended to Feb 28, 2024.

Development/Implementation Schedule

BMP DS1:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
DS1	Continue to implement post-construction requirements for development and redevelopment.			
	Review, as needed, existing Post-Construction Codes and Standards to ensure compliance with required post construction authority, LID requirements, and identify, minimize or eliminate ordinance, or code and development standard barriers to low impact development.			No Action
	Continue to implement current site plan review process for post-construction for development and redevelopment.			
	Review site plan review process(s) and ordinance to ensure compliance with permit requirement			No Action
	Review retention, treatment, and mitigation requirements of the permit and identify gaps, options, and needs.			No Action

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	No Action		Draft findings and take to Council, as needed, for new program implementation by September 1, 2023 - Modified Permit extended to Feb 28, 2024.	

BMP DS2: Post Construction Stormwater Facilities Long-Term Operation and Maintenance**Responsible Parties**

The City's Community Development Division maintains the Springfield Development Code, enforcement of the City Code is conducted in coordination with the Office of the City Attorney. Environmental Services Divisions implements the inventory and inspection program for public and private stormwater treatment facilities and Information Technology GIS division provides mapping and database management.

BMP Description

This BMP provides for an inventory, inspection, and compliance program to ensure that private stormwater management systems (both vegetated and structural) are constructed consistent with City development code and review approvals and are operated and maintained long-term.

This BMP covers activities to meet Schedule A.3.e.vi of the Modified MS4 General Permit.

Existing Conditions

Springfield already has legal authority to inspect facilities and require maintenance with O&M agreements. As described in BMP DS1, the City has required, through the development review and approval process, stormwater management systems (both structural and vegetated) in private developments for many years. The systems approved under the current standards are intended to meet the requirement at the time they become operational. Developments are required to maintain sites in the approved conditions for the duration of their operation, the City currently has developed a program and staffing to ensure "adequate long-term operation and maintenance" of stormwater management systems.

In 2010 the City implemented its post-construction water quality facility Inventory and inspection program. Refinements to this program have been implemented in order to adaptively manage inventory and inspection processes. Water Resources staff developed the City's *Water Quality Facility Management Program* that explains program development and implementation. Staff also drafted program documents for inspection criteria and procedural guidelines to provide consistent inspection and enforcement. As the facilities become inventoried, they are digitally tracked by using a GIS mapping application and inspected by using a GIS Survey Application. This program becomes more and more time consuming to implement and manage as development is ongoing and additional facilities are inventoried and inspected annually. Additionally, facilities are constructed based on the existing code at the time of construction – creating different standards for different facilities for different time frames.

Proposed MS4 Plan Activities

The City will continue to implement the current Water Quality Facility Management Program. Water Resource staff will continue to inventory and map the private stormwater management systems that have been constructed, inspect them, and provide education and technical assistance to property owners, as well as enforcement activities if and when needed to remediate substandard conditions, to the MEP and within budget constraints. Public stormwater management systems will be included in the inventory mapping and inspection process. Staff will review the current program and update if warranted.

Additionally, there will be a review of the language pertaining to O&M requirements in the Dev. Code and EDSPM to see if updates to O&M language or requirements are needed. If changes to City Code or standards are needed, then they will be taken to Council for adoption.

Measurable Goals

Continue implementation, throughout the permit term, of the WQF Management Program which includes inventory, site inspections as well compliance actions that bring the facility into compliance with Code, and/or Land Use decisions to MEP. Review Dev. Code and EDSPM language and see if updates to O&M language are warranted by the end of the second fiscal year and take to Council for adoption by the end of the permit term.

Review the Water Quality Facility Management Program and identify any needed refinements. This review will be completed at the same time as the O&M language is reviewed; updates if needed, will be completed by the end of the permit term.

Development/Implementation Schedule

BMP DS2:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
DS2	Continue to implement the current WQF Management Program; continue inventorying, tracking inspections, and compliance activities annually.			
	Review Dev. Code and EDSPM and see if updates to O&M language or requirements are needed.		Take updated O&M requirements to Council, if needed.	
	Review and update as needed the WQF Management Program to ensure compliance with processes for inspection, tracking, inventory, and reporting.			

BMP DS3: Post Construction Stormwater Management Training, Tracking, and Assessment

Responsible Parties

Under the direction of the Development and Public Works Department Director

BMP Description

This BMP addresses ongoing training and reporting requirements. To maintain an effective program staff will need to receive periodic training and education, this BMP will provide for ongoing staff training as needed by incorporating post-construction runoff education and training into the internal staff training strategy, which is part of a larger staff training strategy and provide training, at least once during the permit term, to persons involved in program implementation. Additionally, the Modified MS4 General Permit requires program assessment to assess program implementation and annual reporting to the DEQ of specific information. It will ensure on going tracking, program assessment, and reporting information.

This BMP covers activities to meet Schedule A.3.e.vii-viii of the Modified MS4 General Permit.

Existing Conditions

Staff has received training and implements an effective stormwater management inventory and inspection program that addresses both public and private water quality facilities. There are regional stormwater and green infrastructure conferences, webinars, symposiums held annually that staff attends when resources are available. This allows for insight into other national, statewide, and regional programs and lessons learned. There currently is no certification training available thus staff rely on other programs and knowledge for program guidance. New staff or staff assisting in program inspections receive in-field training.

As Code changes are adopted and implemented, planning and engineering staff receive notification of the changes. As the MS4 General Permit begins implementation planning and engineering staff will need to be kept more informed on reviews and updates based on the permit requirements.

The Facility Management Program tracks inventory and inspection information in an ArcGIS format that allows for reporting information.

Springfield has been assessing program implementation and providing a summary in annual reports, the Modified MS4 General Permit now requires program assessment to assess program implementation and annual reporting to the DEQ of specific information.

Water Resources staff maintain inventory, inspection, program implementation project descriptions and associated documents that are used to provide a summary and reporting information annually.

Proposed MS4 Plan Activities

Staff will incorporate post-construction runoff education and training into an internal staff training strategy, which is part of a larger training strategy and provide training to persons involved in program implementation, such as, staff involved in plan review and/or site inspection. If a post-construction runoff control certification becomes available in Oregon, staff will seek funding to have relevant O&M inspection staff certified. Additionally, develop post-construction program review template to ensure permit requirements are being met and assess progress towards implementation of the program in each annual report.

Measurable Goals

Incorporate post construction education and training into the internal staff training strategy, which is part of a larger strategy for training internal staff by the end of the second fiscal year. Provide training to persons involved in program implementation at least once during the permit term. If a post-construction runoff control certification becomes available in Oregon, seek funding to have relevant O&M inspection staff certified. Develop post-construction program review template to ensure permit requirements are being met by the end of the second fiscal year. Assess progress towards implementation of the program in each annual report.

Development/implementation Schedule

BMP DS3:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
DS3	Incorporate Post-Construction Runoff education and training into the internal staff training strategy.		Provide training, at least once during the permit term, to persons involved in implementation.	
	If a post-construction runoff control certification becomes available in Oregon, seek funding to have relevant O&M inspection staff certified.			
	Develop post-construction program review template to ensure we are meeting the permit requirements; assess progress towards implementation of the program in each annual report(s).		Assess progress towards implementation of the program in annual report.	Assess progress towards implementation of the program in annual report.

Minimum Control Measure #6: Pollution Prevention in Municipal Operations

Regulation: Modified MS4 General Permit - Schedule A.3.f.

“The permit registrant must properly operate and maintain its facilities, using prudent pollution prevention and good housekeeping to reduce the discharge of pollutants through the MS4 to waters of the state.”

This Modified General Permit Schedule further identifies specific operational strategies for operation and maintenance of stormwater controls.

- Strategy for existing structural stormwater controls installed or permitted by the permit registrant prior to the effective date of this permit, and maintenance strategy for both permit registrant-owned controls and controls owned and operated by other non-MS4 entities discharging to the MS4.
- Inspection of at least 50 percent of City-owned or operated catch basins and inlets at least once every five years and, based on the inspection results, maintain and clean them to ensure they function as designed.
- Pollution prevention from routine activities such as storm system and conveyance system maintenance, road maintenance, building and sidewalk maintenance, fleet maintenance, landscape maintenance, solid waste management, and firefighting training activities.
- Requires the review of industrial activities that may require additional NPDES permits.
- Must implement practices to reduce the discharge of pollutants associated with the application and storage of pesticides and fertilizers.
- Must implement methods to reduce litter.
- Manage and disposal of pollutants removed in the course of maintenance, treatment, control of stormwater, or other wastewaters in a manner to prevent such pollutants from entering the waters of the state.
- Training and education of responsible key staff.

This section also requires program tracking and reporting: *“must maintain records for activities conducted to meet the requirements of the pollution prevention and good housekeeping for municipal operations program requirements and include a descriptive summary of their activities in the corresponding Annual Report.”*

Applicable City of Springfield MS4 Plan BMPs

Operation and Maintenance (OM):

OM1 – Routine Maintenance Operations for Water Quality

OM2 -- Pollution Control Manuals and Guidelines for City Operations

OM3 – Municipal Operations Training, Tracking, and Assessment

Rationale

The City selected the above three BMPs to address pollution prevention in municipal operations. BMP OM1 - Routine Maintenance Operations for Water Quality will provide for ongoing implementation of current routine operation and maintenance activities for stormwater management while drafting a 5-year strategy to combine routine and required maintenance activities and scheduling into a document that will ensure program requirements are being met. Currently the City's Operational activities are assigned via a workorder system and tracked in an asset management database as are based on seasonal implementation. Budget and planning documents carry program descriptions and are used as planning tools. Routine maintenance activities are implemented annually and are impacted periodically by natural events such as seasonal storms. With the issuing of the Modified General Permit some routine activities will now need to meet a quantitative amount of productive activity annually. The permit requires maintenance activities that include requirements for both surface and sub-surface cleaning. The drafting of a 5-year Maintenance Strategy for Stormwater Controls will allow for planning, budgeting, and scheduling to be identified in a single document and managed accordingly.

Maintenance Strategy for Stormwater Controls could include O&M activities such as:

- Catch basin cleaning
- Storm line cleaning
- Water Quality Facility O&M (Vegetated)
- Water Quality Structure O&M
- Flow Control Structure O&M
- Channel and ditch cleaning and reshaping
- Litter control
- Street sweeping
- Leaf pick-up program

BMP OM2 - Pollution Control Manuals for City Operations includes ongoing implementation and review of existing pollution control manuals and guidelines for City activities that may adversely affect water quality. The City maintains guidance manuals that address activities that can potentially affect water quality and provides operational procedures that will help in either the reduction or removal of the potential pollution load.

Like most guidance materials, in order to stay well informed and aware of current pollution reduction approaches and keep staff educated, the documents will need periodic review and updating. Springfield's current guidance documents that need to be reviewed include documents such as:

- Pollution Control BMP Manual for Routine Maintenance Activities (PC-BMP Manual) – updated 2007
- Stormwater Pollution Control Plan (SWPCP) for the Maintenance Complex – updated November 2009

- SWPCP for the South 16th Facility Lot – updated August 2009
- Stormwater BMP Guidance Manual for the Fire Department – updated August 2009
- Spill Prevention Control and Countermeasure Plan (SPCC) for the Regional Fuel Facility – updated March 2010
- Fire Station Washing Facility Instructions and Guidance Manual – 2017

The Modified General Permit also requires the permittee to review regulations and determine if any owned or operated facilities with industrial activity as defined in 40 CFR §122.26(b)(14) discharging stormwater to the waters of the State require coverage under DEQ's NPDES Industrial Stormwater Permit. Under this BMP, Water Resources staff will review regulations and determine if any City facilities with industrial activity as defined in 40 CFR §122.26(b)(14) need coverage under NPDES Industrial Stormwater Permit.

BMP OM3 – Municipal Operations Training, Tracking, and Assessment was selected to address ongoing training and reporting requirements. Staff has received training to implement an effective operation and maintenance program that addresses both surface and sub-surface maintenance activities. City Operations Division staff are hired and trained through an apprenticeship program. To maintain an effective program staff will need to receive periodic training and education; this BMP will provide for ongoing training as needed. Additionally, the Modified MS4 General Permit requires a program assessment annual reporting to the DEQ of specific information. This BMP will also ensure on going tracking, program assessment, and reporting of information.

Responsible Parties

Under the Development and Public Works Division Directors, Environmental Services and Operations Divisions

Summary of Measurable Goals

Operations staff will continue to implement routine infrastructure maintenance activities to reduce stormwater pollution (street sweeping, catch basin cleaning, water quality facility maintenance, etc.) throughout the permit term and within City resources to the MEP. Water Resources and Operations staff will work together to draft a *Maintenance Strategy for Stormwater Controls* that includes catch basin and litter management activities by the end of the second fiscal year and implement the strategy to the end of the permit term. Operations staff will annually inspect at minimum 10% of the owned or operated catch basins and clean as needed, with a goal of 50% at least once in the permit term. Staff will continue to maintain inspection and cleaning records throughout the permit term.

The evaluation of City operations and the development of appropriate pollution control manuals/guidelines has been implemented since 2007 under the Individual NPDES Permit. Staff will continue to implement the *Pollution Control Manual for Routine Maintenance Activities*, and other stormwater pollution guidance manuals and/or documents to minimize impacts to stormwater runoff throughout the permit term. Staff will develop a review and

updated schedule for such documents with the goal to review and update at least two a year starting the second fiscal year and ending by the end of the permit term.

Water Resource staff will review regulations and determine if any City facilities with industrial activity as defined in 40 CFR §122.26(b)(14) need coverage under NPDES Industrial Stormwater Permit by the end of the first fiscal year and draft findings by the end of the second fiscal year.

Staff will develop Pollution Prevention in Municipal Operations Staff training into a larger strategy by the end of the second fiscal year then implement the training strategy throughout the rest of the permit term.

Operations staff will be provided training, at least once during the permit term, to persons involved in post-construction O&M for public water quality facilities and operation and maintenance for existing stormwater controls such as, catch basin cleaning and storm system cleaning, and pollution prevention in facilities and operations.

Staff will develop a pollution prevention and good housekeeping program review template by the end of the first fiscal year and assess progress towards implementation of the program in each annual report.

Development/Implementation Schedule Summary (permit year modified based on permit issuance date)

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
OM 1	Continue to implement routine infrastructure maintenance activities to reduce stormwater pollution (street sweeping, catch basin cleaning, water quality facility maintenance, etc.) throughout the permit term and within City resources to MEP.			
	Draft Maintenance Strategy for stormwater controls, include catch basin and litter management.		Implement Maintenance Strategy to reduce stormwater pollution.	
	Annually inspect at minimum 10% of the owned or operated catch basins and clean as needed. Maintain inspection and cleaning records. (50% at least once in the permit term)			
OM 2	Continued implementation of the Pollution Control Manual for Routine Maintenance Activities, and other stormwater pollution guidance manuals and/or documents to minimize impacts to stormwater runoff.			

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
	No Action	Develop a pollution control guidance manual update schedule and review and update at least 2 guidance documents.	Review and update at least 2 guidance documents.	Review and update at least 2 guidance documents.
	Review regulations and determine if facilities with industrial activity as defined in 40 CFR §122.26(b)(14) need coverage under NPDES Industrial Stormwater Permit.	Draft findings of 1200Z permit review.	No Action	
OM 3	Incorporate Pollution Prevention in Municipal Operations education and training into the internal staff training strategy.		Implement training strategy no later than February 28, 2023 (Modified permit extended until February 28, 2024 if needed).	
	Provide training, at least once during the permit term, to persons involved in: <ul style="list-style-type: none"> • Operation and Maintenance Strategy for Existing Controls • Pollution Prevention in Facilities and Operations 			
	Develop a pollution prevention and good housekeeping program review template; assess progress towards implementation of the program in annual report.	Assess progress towards implementation of the program in each annual report.		

BMP OM1: Routine Maintenance Operations for Water Quality**Responsible Parties**

Under the direction of the Operations Division Director

BMP Description

This BMP will provide for ongoing implementation of current routine operation and maintenance activities for stormwater management while drafting a 5-year strategy to combine routine and required maintenance activities and scheduling into a document that will ensure program requirements are being met.

Operations staff will continue to implement routine infrastructure maintenance activities to reduce stormwater pollution (street sweeping, catch basin cleaning, water quality facility maintenance, etc.). Water Resources and Operations staff will work together to draft a Maintenance Strategy for Stormwater Controls that includes catch basin and litter management activities. Operations staff will annually inspect at minimum 10% of the owned or operated catch basins and clean as needed, with a goal of 50% at least once in the permit term. Staff will continue to maintain inspection and cleaning records throughout the permit term.

The drafting of a 5-year Maintenance Strategy for SW Controls will allow for planning, budgeting, and scheduling to be identified in a single document and managed accordingly.

Maintenance Strategy for SW Controls could include O&M activities such as:

- Catch basin cleaning
- Storm line cleaning
- Water Quality Facility O&M (Vegetated)
- Water Quality Structure O&M
- Flow Control Structure O&M
- Channel and ditch cleaning and reshaping
- Litter control
- Street sweeping
- Leaf pick-up program

This BMP covers activities to meet Schedule A.3.f.ii-iii and vii of the Modified MS4 General Permit.

Existing Conditions

Currently the City Operational activities are assigned via a workorder system and tracked in an asset management database as is based on seasonal implementation. Budget and planning documents carry program descriptions and are used as planning tools. Routine maintenance activities are implemented annually and are impacted periodically by natural events such as seasonal storms. With the issuing of the Modified General Permit some routine activities will now need to meet a quantitative amount of productive activity annually. The permit requires maintenance activities that include requirements for both surface and sub-surface cleaning. The drafting of a 5-year Maintenance Strategy for SW Controls will allow for planning, budgeting, and scheduling to be identified in a single document and managed accordingly.

Catch basin cleaning is a program which has been implemented by the City for many years. This program originated out of the desire to maintain the storm system to prevent clogging and plugging of the pipes that would result in flooding, but now it is viewed as a pro-active measure to capture and remove sediments before they can reach local rivers and streams. There are over 6000 catch basins that are maintained by City staff that collect trash, leaves, dirt, and other contaminants from roadsides, which otherwise flows into the stormwater drainage system, carrying contaminants and toxins. The City currently operates one vacuum truck that provides routine cleaning of basins annually and seasonally. The rest of the year the vacuum truck is being utilized for storm pipe cleaning and culvert cleaning; both activities are also productive in removing and capturing sediments and their associated pollutants before they reach the river.

Street sweeping also is a program which has been provided by the City for many years. While this program originated out of the desire to maintain streets for aesthetic and safety purposes, it now is supported partly by drainage user fees for the purposes of keeping debris and pollution out of the stormwater drainage system. Mechanized sweepers service established routes throughout the city, sweeping approximately 4,500 "curb miles" of streets with three sweepers per year. This practice collects trash, leaves, dirt, and other contaminants from roadsides and gutters, which otherwise flows into the stormwater drainage system, carrying contaminants and toxins. The City operates sweepers year-round: two mechanical sweepers, which excel in picking up large debris quickly, and a newer "regenerative air," or "vacuum sweeper," which works like a vacuum cleaner, and efficiently picks up smaller particles, including many pollutants missed by the mechanical sweeper. The street sweeping schedule provides for sweeping all streets within the city on a variable basis, from heavily traveled streets swept several times per week to residential streets swept every 6 to 10 weeks. Sweepers are also used to respond to certain types of spill clean-up work at accident or roadway spill scenes, where the material is able to be safely swept up with this type of equipment.

Other stormwater pollution reduction activities that Operations staff routinely perform include storm line cleaning, public water quality facility O&M (both vegetated and structural), flow control structure O&M, and channel and ditch cleaning/reshaping. These activities are also seasonal and provide for flood control as well as pollution control. These O&M practices collect trash, leaves, dirt, and other contaminants from piped storm lines, roadside drainage, and water quality facilities, which otherwise would remain in the

stormwater drainage system with the potential of carrying contaminants and toxins to the local rivers.

Other programs that the City implements are the Leaf Pick-Up Program, Little Litter Program and the Springfield Clean Up. The Leaf Pick-Up Program is a seasonal activity which collects fallen leaves and gutter debris which prevents debris and pollutants from entering and plugging the storm system. The Little Litter Program is an education and outreach program that focuses on educating the public on problem trash in problem areas. Program projects have been posting signage, bus advertisements, posting door hangers, and business partnerships. The Springfield Spring Clean Up is a program that encourages property owners in Springfield to clean up their yards and allows them to bring garbage and recyclables to a central location for proper disposal for free.

Proposed MS4 Plan Activities

Operations staff will continue to implement routine infrastructure maintenance activities to reduce stormwater pollution (street sweeping, catch basin cleaning, water quality facility maintenance, etc.) throughout the permit term and within City resources to MEP. Water Resources and Operations staff will work together to draft a Maintenance Strategy for Stormwater Controls that includes catch basin and litter management activities and implement the strategy. Operations staff will annually inspect, and clean as needed City owned or operated catch basins with a goal of 50% inspected and cleaned at least once in the permit term. Staff will continue to maintain inspection and cleaning records throughout the permit term.

Measurable Goals

Continue to implement routine infrastructure maintenance activities to reduce stormwater pollution throughout the permit term and within City resources to MEP. Draft Maintenance Strategy for stormwater controls, include catch basin and litter management by the end of the second fiscal year and implement the Maintenance Strategy to reduce stormwater pollution to the end of the permit term. Annually inspect at minimum 10% of the owned or operated catch basins and clean as needed, with a goal to meet 50% at least once in the permit term. Maintain inspection and cleaning records.

Development/Implementation Schedule

BMP OM1:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
OM 1	Continue to implement routine infrastructure maintenance activities to reduce stormwater pollution (street sweeping, catch basin cleaning, water quality facility maintenance, etc.) throughout the permit term and within City resources to MEP.			
	Draft Maintenance Strategy for stormwater controls, include catch basin and litter management.		Implement Maintenance Strategy to reduce stormwater pollution.	
	Annually inspect at minimum 10% of the owned or operated catch basins and clean as needed. Maintain inspection and cleaning records. (50% at least once in the permit term)			

BMP OM2: Pollution Control Manuals and Guidelines for City Operations**Responsible Parties**

Operations and Environmental Services Division, under the direction of the Department Division Directors

BMP Description

This BMP includes ongoing implementation and review of existing pollution control manuals and guidelines for City activities that may adversely affect water quality. Springfield's current operational guidance documents that should be reviewed include documents such as:

- PC BMP Manual for Routine Maintenance Activities – updated 2007
- SWPCP for the Maintenance Complex – updated November 2009
- SWPCP for the South 16th Facility Lot – updated August 2009
- Stormwater BMP Guidance Manual for the Fire Department – updated August 2009
- SPCC for the Regional Fuel Facility – updated March 2010
- Fire Station Washing Facility Instructions and Guidance Manual 2017

These documents cover activities that are listed in the Modified MS4 General Permit under Schedule A.3.f.iv.(D-N). The City does not maintain parks, golf courses, airports, swimming pools, or marinas.

The Modified General Permit also requires the permittee to review regulations and determine if any owned or operated facilities with industrial activity as defined in 40 CFR §122.26(b)(14) discharging stormwater to the waters of the State require coverage under DEQ's NPDES Industrial Stormwater Permit. Under this BMP, Water Resource staff will review regulations and determine if any City facilities with industrial activity as defined in 40 CFR §122.26(b)(14) need coverage under NPDES Industrial Stormwater Permit.

This BMP covers activities to meet Schedule A.3.f.iv-vi and viii of the Modified MS4 General Permit

Existing Conditions

In 2001, the City first started reviewing maintenance work practices that could potentially contribute to water quality or habitat degradation. Reference manuals developed by the Association of Clean Water Agencies (ACWA) and the League of Oregon Cities (LOC) were used to guide this evaluation, in order to determine where alternative practices are needed to comply with CWA and ESA requirements. Based on this evaluation, practices found to have significant potential for negatively impacting water quality were further scrutinized for the possibility of implementing alternate methods. Procedures were

standardized and integrated into a *Pollution Control Manual for Routine Maintenance Activities* for the City's Operations Division.

A similar evaluation process was conducted for other City practices with the potential to degrade stormwater quality. The process was essentially the same, working closely with staff from other departments, to identify activities, assess their impacts on stormwater quality, and determining if there were effective and appropriate measures available to minimize stormwater pollution.

Currently additional guidance manuals or documents cover a wide variety of activities addressing housekeeping and operations. Some examples are pollution control plans for storage yards, stormwater BMPs for the fire departments, spill prevention control and counter measures for the fuel facility, erosion and sediment control manuals, standard operation policy and procedures for hazardous spills and response, and sanitary sewer overflows.

Proposed MS4 Plan Activities

The evaluation of City operations and the development of appropriate pollution control manuals/guidelines has been implemented since under the Individual NPDES Permit. Staff will continue to implement the *Pollution Control Manual for Routine Maintenance Activities*, and other stormwater pollution guidance manuals and/or documents to minimize impacts to stormwater runoff throughout the permit term. Staff will develop a review and updated schedule for such documents with the goal to review and update at least two a year starting the second fiscal year and ending by the end of the permit term.

Water Resource staff will review regulations and determine if any City facilities with industrial activity as defined in 40 CFR §122.26(b)(14) need coverage under NPDES Industrial Stormwater Permit by the end of the first fiscal year and draft findings by the end of the second fiscal year.

Measurable Goals

Continued implementation of the *Pollution Control Manual for Routine Maintenance Activities*, and other stormwater pollution guidance manuals and/or documents to minimize impacts to stormwater runoff throughout the permit term. Beginning the second fiscal year develop a review and update schedule for pollution reduction and control guidance documents with the goal to review and update, if needed, at least two documents a year and ending by the end of the permit term. Review regulations and determine if any City facilities with industrial activity as defined in 40 CFR §122.26(b)(14) need coverage under NPDES Industrial Stormwater Permit by the end of the first fiscal year and draft findings by the end of the second fiscal year.

Development/Implementation Schedule

BMP OM2:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
OM 2	Continued implementation of the Pollution Control Manual for Routine Maintenance Activities, and other stormwater pollution guidance manuals and/or documents to minimize impacts to stormwater runoff.			
	No Action	Develop a pollution control guidance manual update schedule and review and update at least 2 guidance documents.	Review and update at least 2 guidance documents.	Review and update at least 2 guidance documents.
	Review regulations and determine if facilities with industrial activity as defined in 40 CFR §122.26(b)(14) need coverage under NPDES Industrial Stormwater Permit.	Draft findings of 1200Z permit review.	No Action	

BMP OM3: Municipal Operations Training, Tracking, and Assessment**Responsible Parties**

Operations and Environmental Services Division, under the direction of the Department Division Directors

BMP Description

To maintain an effective program staff will need to receive periodic training and education, this BMP will provide for ongoing training as needed. Additionally, the Modified MS4 General Permit requires program assessment to assess program implementation and annual reporting to the DEQ of specific information. This BMP will also ensure on going tracking, program assessment, and reporting of such information. This BMP covers activities to meet Schedule A.3.f.ix-x of the Modified MS4 General Permit.

This BMP covers activities to meet Schedule A.3.f.ix-x of the Modified MS4 General Permit

Existing Conditions

Staff has received training and implements an effective operational and maintenance program that addresses both surface and sub-surface maintenance activities. City Operations Division staff are hired and trained through an apprenticeship program. Operation performs multiple maintenance activities that include maintaining stormwater controls such as catch basins, open channels, and public water quality facilities. Additionally, Operations work force is periodically enhanced by hiring seasonal workers to help maintain water quality facilities and clean open channel systems. They are trained upon hire in the field.

Although Springfield has been assessing program implementation and providing a summary in annual reports, the Modified MS4 General Permit now requires program assessment and annual reporting to the DEQ of specific information. Operations staff maintains inventory, inspection, and program implementation information that are used to provide a summary and reporting of information annually.

Proposed MS4 Plan Activities

Operations staff will work with ESD staff to incorporate Pollution Prevention in Municipal Operations training into the internal staff training strategy which will be part of a larger staff training strategy and implement the training strategy. Operations staff will be provided training, at least once during the permit term, to persons involved in post-construction O&M for public facilities, operation and maintenance for existing stormwater controls, and pollution prevention in facilities and operations.

Water Resources staff will develop a pollution prevention and good housekeeping program review template and assess and report progress towards implementation of the program in each annual report.

Measurable Goals

Incorporate pollution prevention in municipal operations training into the internal staff training strategy, which is part of a larger strategy for training internal staff by the end of the second fiscal year. Provide training to Operations staff, at least once during the permit term, to persons involved in post-construction O&M for public facilities, operation and maintenance for existing stormwater controls, and pollution prevention in facilities and operations.

Develop a pollution prevention and good housekeeping program review template by the end of the first fiscal year and assess progress towards implementation of the program in each annual report.

Development/Implementation Schedule

BMP OM3:

BMP#	PERMIT YEAR			
	June 1, 2021 to June 30, 2021 FY21	July 1, 2021 to June 30, 2022 FY22	July 1, 2022 to June 30, 2023 FY23	July 1, 2023 to Feb 28, 2024 FY 24
OM 3	Incorporate Pollution Prevention in Municipal Operations education and training into the internal staff training strategy.		Implement training strategy no later than February 28, 2023 (Modified permit extended until February 28, 2024 if needed).	
	Provide training, at least once during the permit term, to persons involved in: <ul style="list-style-type: none"> • Operation and Maintenance Strategy for Existing Controls • Pollution Prevention in Facilities and Operations 			
	Develop a pollution prevention/good housekeeping program review template; assess progress towards implementation of the program in annual report.	Assess progress towards implementation of the program in each annual report.		

